

SUZANNE GREENE  
SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 CIVIL ACTION NO: 1:19-CV-01338-AT  
6

7 SUZANNE GREENE,

8 Plaintiff,

9 vs.

10 TYLER TECHNOLOGIES,

11 Defendant.  
12

13 DEPOSITION OF: SUZANNE GREENE

14 AUGUST 29, 2019

15 9:53 A.M.  
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2  
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## PROCEEDINGS

AUGUST 29, 2019

9:53 A.M.

THE VIDEOGRAPHER: This is the deposition of Suzanne Greene in the matter of Suzanne Greene versus Tyler Technologies, Inc. Today's date is August 29th, 2019. The time on the record is 9:53 a.m.

My name is Todd Parker. I'm the videographer. The court reporter is Cindy Jenkins.

Counsel, please introduce yourselves, state who you represent, after which, the court reporter will swear in the witness.

MR. MCKEEBY: Paulo McKeeby, I represent Tyler Technologies. And I'm here with in-house counsel, Abby Diaz.

MR. HERRINGTON: I'm Matthew Herrington, and I'm here representing the plaintiff, Suzanne Greene.

SUZANNE GREENE,  
having been first duly sworn, was examined and testified as follows:

EXAMINATION BY MR. MCKEEBY:

Q. Ms. Greene, will you state your

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1 full name for the record, please.

2 A. It's Suzanne Greene.

3 Q. What is your current residential  
4 address?

5 A. It's 110 Sheldon Way in  
6 Fayetteville, Georgia.

7 Q. How long have you lived there?

8 A. About a year now.

9 Q. Have you ever had your deposition  
10 taken before today?

11 A. No, I have not.

12 Q. I'm sure your counsel may have  
13 gone over some of the ground rules; but I want  
14 to do that as well for the purposes of the  
15 record. You understand you're under oath?

16 A. Yes, sir.

17 Q. Is that yes?

18 A. (Nodding head.)

19 Q. And you understand that the court  
20 reporter is taking down your testimony?

21 A. Yes.

22 Q. And because she's taking it down  
23 in what will be memorialized in a transcript,  
24 if you could do your best to do a couple of  
25 things: One is to answer me audibly as

1     opposed to nodding or shrugging; is that  
2     agreeable?

3             A.       Yes.

4             Q.       If you don't do that, I might ask  
5     you to state your answer as opposed to --

6             A.       Okay.

7             Q.       -- making a gesture.

8                     The other thing to mention in that  
9     regard is that there are going to be times  
10    when you're going to know where I'm going with  
11    my question, perhaps, and you're going to want  
12    to talk before I finish. If you could do your  
13    best to not give your answer until I'm done  
14    with my question so we're not talking over  
15    each other and we'll have a cleaner record; is  
16    that agreeable?

17            A.       Yes, sir.

18            Q.       And I'll try to do my best as well  
19    in waiting until you're finished with an  
20    answer before I ask you the next question.

21            A.       Okay.

22            Q.       And if I don't do that, which has  
23    happened before, if you could let me know that  
24    you're not finished and then we can go back to  
25    your answer; is that agreeable?

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1 A. Yes, sir.

2 Q. If I ask you a question that you  
3 don't understand because I'm using a technical  
4 term incorrectly or for whatever reason, just  
5 let me know, and I'll try to ask you a more  
6 understandable question; is that agreeable?

7 A. Yes.

8 Q. Have you ever been a party to a  
9 lawsuit before this?

10 A. No.

11 Q. Have you ever given testimony  
12 under oath before today?

13 A. No.

14 Q. Have you ever filed an  
15 administrative charge with the government  
16 against any employer?

17 A. Can you explain that, what does  
18 that mean?

19 Q. Well, like a -- like a charge with  
20 the Equal Employment Opportunity Commission or  
21 the Department of Labor or a government agency  
22 like that?

23 A. No.

24 Q. When did you first obtain counsel  
25 in this matter?

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1           A.           It was around February -- around  
2           that time, February of this year, 2019.

3           Q.           What were your dates of employment  
4           with Tyler Technologies?

5           A.           I started -- so now just with  
6           Tyler Technologies? Or with ExecuTime as  
7           well?

8           Q.           Yeah, that's a good point --

9           A.           I'm sorry.

10          Q.           I just violated what I told you.  
11          Yes. So I understand that Tyler acquired  
12          ExecuTime in June of 2016?

13          A.           Yes, that's correct.

14          Q.           And you commenced employment with  
15          ExecuTime in February of 2016; correct?

16          A.           Yes, that is correct.

17          Q.           And so for the purposes of this  
18          deposition, when I say "Tyler," I'm going to  
19          mean the entirety of your employment with both  
20          ExecuTime and Tyler; agree?

21          A.           Okay.

22          Q.           There may be times when you need  
23          to answer separately or there may be questions  
24          that I ask that called for separate answers.  
25          If that's the case, I'm going to tell you.



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1 A. Yes.

2 Q. But rather than try to -- when I'm  
3 saying, "your employer," when I'm saying  
4 "Tyler," I'm referring to the entire tenure of  
5 your employment between February of 2016 until  
6 your resignation.

7 A. Okay. Thank you.

8 MR. HERRINGTON: Paulo, can you  
9 remind me, are we -- are y'all contesting  
10 successor liability? I realize liability is  
11 contested. But the successor -- because if  
12 it's not, that changes what I need to object  
13 to; potentially, I cannot make objections  
14 that I otherwise would have.

15 MR. MCKEEBY: Let's talk, can we  
16 talk about that during a break?

17 MR. HERRINGTON: Sure. Okay.

18 MR. MCKEEBY: I think the answer  
19 is no, but I want to confirm that that's the  
20 case. Or -- I mean, what would be your  
21 objection if you don't --

22 MR. HERRINGTON: Yeah, if I  
23 need -- if I -- vagueness, you know.

24 MR. MCKEEBY: Yeah.

25 MR. HERRINGTON: If I suspect that

1 a distinction needs to be made, you know?

2 MR. MCKEEBY: Well, I mean, I  
3 don't think that depends on our position with  
4 respect to successor liability. So I would  
5 just suggest that you make your objection  
6 based on the question.

7 MR. HERRINGTON: Okay.

8 Q. (By Mr. McKeeby) And again, if  
9 there's some ambiguity in the question where  
10 you need to make a distinction between the way  
11 something was at -- after the acquisition as  
12 opposed to during the first few months of your  
13 employment when ExecuTime was your technical  
14 employer, you can let me know in your answer;  
15 agreeable?

16 A. Okay. Yes.

17 Q. When you contacted an attorney in  
18 February of 2019, was that Mr. Herrington?

19 A. It was actually Mitch -- what's  
20 his real name? I'm sorry, I don't know his  
21 full name.

22 Q. It was someone else at  
23 Mr. Herrington's firm?

24 A. Yes, that is correct.

25 Q. And his first name is Mitch?

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1 A. Yes.

2 MR. HERRINGTON: For the record,  
3 it's Mitchell Benjamin.

4 THE WITNESS: Mitchell, sorry.

5 Q. (By Mr. McKeeby) Did you know  
6 Mitchell Benjamin before you contacted him?

7 A. He was actually referred to me.  
8 Somebody else recommended him.

9 Q. Who referred him?

10 A. My sister did.

11 Q. What's your sister's name?

12 A. Her name is Holly.

13 Q. Where is she?

14 A. She lives here in Georgia as  
15 well.

16 Q. What did you discuss with your  
17 sister as to the reason for you needing a  
18 lawyer?

19 A. So the initial reason for my  
20 call was my incentive was cut down in half.  
21 And no one had explained to me the reason  
22 why. So when I had reached out to my  
23 supervisor's supervisor, she said I should  
24 have been informed, which I wasn't.

25 And then my manager actually

1 scheduled a meeting on my calendar for that  
2 Friday to tell me why my check -- my  
3 incentive had decreased already.

4 Q. And when you say "incentive," you  
5 mean your bonus compensation?

6 A. That is correct, yes.

7 Q. And you say it was cut in half?

8 A. About, yes, sir.

9 Q. From what to what?

10 A. So in this specific payout, my  
11 incentive was supposed to be around, I want  
12 to say, probably about 13- or 1,400. And my  
13 check was only about 7. So I noticed a large  
14 decrease, and that's when I reached out.

15 Q. Reached out to a lawyer?

16 A. No, I reached out to my  
17 supervisor first, to see if I could resolve  
18 it.

19 Q. Right. And who was your  
20 supervisor?

21 A. It was my supervisor's  
22 supervisor, so it was Jamie Burns. And at  
23 that moment, I also copied my direct  
24 supervisor -- excuse me, to see if we could  
25 get this resolved.

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1 Q. And who was your direct  
2 supervisor?

3 A. Her name is Hillary Pasch.

4 Q. And that's P-a-s-c-h?

5 A. Yes.

6 Q. So we can get this firm, Ms. Pasch  
7 was your supervisor throughout your employment  
8 with ExecuTime and Tyler; correct?

9 A. No, that is not correct.

10 Q. Okay. At what point was Ms. Pasch  
11 your supervisor?

12 A. I don't recall the exact date  
13 when she became my supervisor. I would say  
14 about a year and a half or so, estimating.

15 Q. How long was she your supervisor?

16 A. Until I left the company.

17 Q. So she was your supervisor for the  
18 last year and a half of your employment with  
19 Tyler?

20 A. An estimate, yes.

21 Q. Estimate?

22 A. Yeah.

23 Q. Who was your supervisor before  
24 then?

25 A. So prior to that, we had Jamie

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1 Burns, which ended up being her direct  
2 supervisor. And then prior to that, I had  
3 John Jenkins.

4 Q. So who did you talk to first,  
5 Ms. Burns, about the decrease in your  
6 incentive compensation?

7 A. I actually sent an e-mail with  
8 both of them on there in regards to, you  
9 know, the discrepancy with my bonus.

10 Q. What did they explain to you the  
11 reason for the change was?

12 A. Jamie was under the assumption  
13 that we had already been informed about it,  
14 and we had not. So Jamie's response was,  
15 well, something to the extent -- I can't  
16 remember verbatim, but this is something  
17 that, you know, Hillary would have already  
18 gone over with you. And I responded and  
19 said, this is not something that was  
20 discussed.

21 Q. Was it just a change to the way  
22 the bonus was calculated?

23 A. That's correct.

24 Q. And these bonuses were paid on a  
25 monthly basis?

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1 A. That is correct.

2 Q. Did you ever have an individual  
3 bonus plan?

4 A. Can you explain that a little  
5 further, I'm sorry?

6 Q. Yes. Let me clarify. I  
7 understand that there was an incentive bonus  
8 plan that I can show you later on in the  
9 deposition that was generic in the sense that  
10 it applied to other employees who performed  
11 your role at ExecuTime and Tyler. Do you  
12 recall that document?

13 A. I do.

14 Q. Was there something that dealt  
15 with you specifically and told you what your  
16 bonus allocation would be?

17 A. So the bonus structure was based  
18 on the amount of time that you were with  
19 Tyler. So that's what determined what bonus  
20 structure you fell under.

21 Q. Right. Okay. That doesn't answer  
22 my question.

23 I'm asking, was there a document,  
24 apart from the general incentive bonus plan,  
25 that was given to you that would have allowed

1 you to calculate what your bonus would have  
2 been? Something that you might have signed or  
3 that had your name on it or -- you've never  
4 seen anything like that?

5 A. Not that I recall.

6 Q. Okay. And did you later have a  
7 discussion with Ms. Pasch about your bonus  
8 compensation?

9 A. Well, she actually scheduled a  
10 call for all of the implementation  
11 consultants, because nobody was informed.  
12 And at that time, everyone found out, the  
13 Friday after I sent the e-mail.

14 Q. And what was discussed in that  
15 call, what was the reason for the change?

16 A. The changes that were made. It  
17 was just -- her reasoning was it was a Tyler  
18 change.

19 Q. And what was the change?

20 A. So the change was based on the  
21 amount of time that you were there, based on  
22 the amount of years. Where I fell -- because  
23 at that time, I was right around three years.  
24 Not many others were -- in fact, I don't  
25 think anyone else was affected other than



1 myself. But the amount of incentive that I  
2 was to receive actually went down.

3 Q. So there was a -- what was  
4 explained to you was that there was a change  
5 in the calculation related to your years of  
6 seniority with Tyler?

7 A. That is correct.

8 Q. And that resulted in your bonus  
9 compensation being less?

10 A. That is correct.

11 Q. What was the last day that you  
12 performed services as an employee for Tyler?

13 A. The last physical work day was  
14 in March 2019.

15 Q. And you went on FMLA leave after  
16 that?

17 A. That is correct.

18 Q. How long was your FMLA leave?

19 A. About two months.

20 Q. And you resigned your employment  
21 at the end of that two-month period?

22 A. Yes, sir, that is correct.

23 Q. How did you do that?

24 A. I sent an e-mail to my HR  
25 manager.

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1 Q. Who was that?

2 A. Lindsey -- I don't recall her --

3 I think Ryto or Roto, something like that.

4 Q. Was she affiliated with ExecuTime  
5 before --

6 A. She was not.

7 Q. -- Tyler's acquisition?

8 A. No.

9 Q. How long did you -- how long was  
10 she your HR manager?

11 A. So I would say about a year and  
12 a half to two years.

13 Q. Do you know where she was located?

14 A. I'm not absolutely sure, sorry.

15 Q. Had you ever communicated with  
16 Ms. Rotell, this Lindsey person on any other  
17 occasion?

18 A. I have, yes.

19 Q. Was that in connection with your  
20 leave?

21 A. Well, I did communicate with her  
22 in regards to my leave, but there was other  
23 issues that I had at Tyler as well that I had  
24 to communicate with her.

25 Q. Any of those issues relate to your

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1 compensation?

2 A. No, sir.

3 Q. What did they relate to?

4 A. I was actually being, like,  
5 verbally abused by another employee, he was  
6 calling me B word and all types of other  
7 unnecessary things.

8 Q. Who was that employee?

9 A. Michael Howell.

10 Q. So you made a complaint?

11 A. I did, yes.

12 Q. Did you understand that this HR  
13 manager, Lindsey, was dedicated exclusively to  
14 the ExecuTime division?

15 A. From my understanding, yes.

16 Q. I'm sorry, what was Michael's last  
17 name?

18 A. Howell.

19 Q. Howell?

20 A. Yeah.

21 Q. What was his position?

22 A. He was -- I believe he's an  
23 implementation consultant, as well, but he's  
24 on the advanced scheduling side.

25 Q. And advanced scheduling is a

1 separate module of the software?

2 A. So it's within the ExecuTime  
3 software, but they deal primarily with, like,  
4 police departments, fire departments, things  
5 of that sort.

6 Q. In your role as an implementation  
7 consultant, did you support advanced  
8 scheduling at all?

9 A. Initially, when I started with  
10 ExecuTime, I actually started out on the  
11 advanced scheduling side. But they did not  
12 see that as a good fit, and that's when I  
13 went over to the time and attendance side,  
14 and they started only hiring retired police  
15 officers and retired fire fighters to deal  
16 with that side.

17 Q. ExecuTime software consists of  
18 advanced scheduling and time and attendance?

19 A. That is correct. And --

20 Q. Am I correct that the time and  
21 attendance was sort of the basic software and  
22 that you had to purchase it in order to also  
23 purchase the advanced scheduling module?

24 A. From my understanding, yes.  
25 It's more like the -- like a preference

1 option, so to say, in the back where you can  
2 turn on certain things like advanced  
3 scheduling and things of that sort.

4 Q. When in your career -- you said  
5 you started out supporting advanced  
6 scheduling?

7 A. Yes, sir.

8 Q. How long did you do that?

9 A. About six months.

10 Q. And after that, for the remainder  
11 of your tenure of employment with Tyler, you  
12 supported time and attendance?

13 A. That is correct.

14 Q. Did your job duties change at all  
15 as a result of that change in the module that  
16 you were supporting?

17 A. Can you be a little more  
18 specific? What do you mean as far as, like,  
19 my job duties?

20 Q. I'm not sure I can. But I'll try.

21 A. Okay.

22 Q. I'll ask it a different way. I  
23 may not be more specific, but I can ask it in  
24 a different way.

25 So it sounded like within six

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1 months of your employment, a decision at Tyler  
2 was made to move you from supporting the  
3 advanced scheduling software to the time and  
4 attendance software?

5 A. Yes, sir.

6 Q. You still had the title of -- I  
7 guess at that point, implementation  
8 consultant; correct?

9 A. No.

10 Q. Your title, at that point, was  
11 what?

12 A. So when I initially started with  
13 ExecuTime, I was a project manager. And once  
14 we were acquired by Tyler, they made a  
15 decision as far as based on experience and,  
16 you know, separating the roles, who would  
17 remain project managers and who would then  
18 change their titles to implementation  
19 consultants, and at that time, my title was  
20 changed.

21 Q. And that was a change that was  
22 separate and distinct from the change in the  
23 software that you were supporting?

24 A. So as --

25 Q. Or was that part of the same

1 process?

2 A. It was different, I believe.  
3 I'm trying to recall the exact time that I  
4 switched over to time and attendance opposed  
5 to advanced scheduling. And it was right  
6 around the same time we were acquired. So I  
7 can't say specifically if --

8 Q. Okay. But it was a separate  
9 decision in terms of you weren't -- when you  
10 transferred over from supporting time and  
11 attendance from advanced scheduling, it wasn't  
12 like at that point you suddenly became an  
13 implementation consultant as opposed to a  
14 project manager; correct?

15 A. That is correct.

16 Q. Okay. So they happened in close  
17 proximity time-wise, but they were sort of  
18 separate decisions or events, if you will?

19 A. Yes, sir.

20 Q. Okay. So in terms of your job  
21 duties, what you did -- and we're going to  
22 talk about that at some length today -- but in  
23 terms of your day-to-day responsibilities, did  
24 they -- did those responsibilities change when  
25 you started supporting the time and attendance

1 software as opposed to the advanced scheduling  
2 software?

3 A. They were slightly different,  
4 yes.

5 Q. How so?

6 A. So, for example, with the  
7 advanced scheduling side, it's a completely  
8 different setup and a different process, you  
9 can say, than the time and attendance side.

10 Q. How did that affect your  
11 day-to-day responsibilities?

12 A. Well, it was basically -- it  
13 was, of course, a large learning curve for me  
14 going from one part of the module to another.  
15 So I definitely had to learn the time and  
16 attendance -- the entire time and attendance  
17 side of the application.

18 Q. Okay. But other than the actual  
19 learning curve and understanding the new  
20 module, in terms of what you did on a  
21 day-to-day basis in terms of your job  
22 responsibilities, did those change?

23 A. Yes. Because they're  
24 different -- they're different sides of the  
25 module. So...



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1 Q. Well --

2 A. Go ahead, I'm sorry.

3 Q. I'm sorry. Let me ask it in a  
4 different way. What things did you do once  
5 you started supporting time and attendance  
6 that you didn't do while you were supporting  
7 advanced scheduling?

8 A. So with the time and attendance  
9 side, we more so focused on clocking in,  
10 clocking out, because it was more of the time  
11 and attendance side of things. Where for  
12 advanced scheduling, the majority of my time  
13 was put into building schedules, because  
14 police officers and fire departments have  
15 unique schedules where they would  
16 automatically populate them.

17 So that took out a big bulk of  
18 what you do within advanced scheduling, which  
19 is not very common on the time and attendance  
20 side.

21 Q. So you no longer had to build  
22 schedules?

23 A. In some circumstances, I did;  
24 but majority of the time, no.

25 Q. Okay. What does it mean to build

1 a schedule?

2 A. So to build a schedule, so let's  
3 say that we have a police officer who rotates  
4 their shifts, and one week they have Tuesdays  
5 and Thursdays off, the next week, they have  
6 Wednesdays and Fridays off. We would  
7 automatically build that schedule on the back  
8 end so that it would populate for them and  
9 they were not required to, like, clock in and  
10 clock out.

11 Q. But in terms of what your  
12 responsibility was to, quote, unquote, build  
13 the schedule, are you actually programming the  
14 software or what is it that you're doing?

15 A. No, I'm not very technical, so  
16 when it comes to, like, programming and  
17 things in depth on the technical side, I did  
18 not handle any of that. All of that would go  
19 through tickets.

20 Q. Right. So when you say you would  
21 build the software, what do you mean in terms  
22 of -- what would you do, integrate information  
23 or just fill out templates or what was your  
24 role in terms of the buildup of these -- of  
25 the advanced scheduling software?

1           A.           So as far as that's concerned,  
2           the project manager would meet with the  
3           actual client and get, like, a questionnaire  
4           filled out, which is where the client would  
5           tell us their specific policies and  
6           procedures, and we would base any schedules  
7           and anything that's done within the  
8           application off of their specific policies  
9           and procedures.

10                        So it's coming from the client,  
11           and when they tell us, okay, these are our  
12           expectations or this is how we would like to  
13           utilize the software, I would then base the  
14           schedules off of that questionnaire.

15           Q.           So you would create the schedule  
16           based on the questionnaire that the client  
17           filled out?

18           A.           Yes, that is correct.

19           Q.           So you would create the schedule,  
20           then, in the client's -- well, I guess at that  
21           point, in the ExecuTime software?

22           A.           That is correct. Yes.

23           Q.           Was there any change in your  
24           duties, as we discussed them, when your title  
25           changed from project manager to implementation

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1 consultant?

2 A. Yes. There was.

3 Q. Okay. And I'm not sure if I asked  
4 this, if I did, I apologize, but when did that  
5 change occur?

6 A. When we were actually acquired  
7 or?

8 Q. No. Well, maybe that's the  
9 answer. But when did you -- when did your  
10 title change from project manager to  
11 implementation consultant?

12 A. When we were acquired.

13 Q. Okay. So June of 2016?

14 A. Yes, sir.

15 Q. Let me ask you this -- I'll back  
16 up. Did your compensation change at all when  
17 you moved from advanced scheduling to time and  
18 attendance?

19 A. Well, we did not always receive  
20 compensation. So we were not receiving it at  
21 that time. So then the answer would be, no,  
22 there was not a change because within  
23 ExecuTime, we did not receive compensation,  
24 like billable hours.

25 Q. I'm talking about what you were

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1 paid?

2 A. Oh, as far as --

3 Q. Your salary?

4 A. -- my salary. My salary,  
5 because of the federal guidelines, there was  
6 something where you had to be at -- don't  
7 quote me on this, please, I believe it was  
8 like 47,500 or something, it was some federal  
9 thing they passed out, so they had to bump me  
10 up.

11 Q. Okay. When did that occur?

12 A. When we were acquired by Tyler.

13 Q. Okay.

14 A. Around that time.

15 Q. So you -- let me just --

16 MR. HERRINGTON: I've never heard  
17 anyone say, don't quote me on this, in a  
18 deposition before.

19 THE WITNESS: Sorry.

20 As you're typing.

21 Q. (By Mr. McKeeby) I'm going to mark  
22 this as Exhibit 1?

23 A. Okay, thank you.

24 (Whereupon, Defendant's

25 Exhibit 1 was marked for

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1 identification.)

2 THE WITNESS: 45, I'm sorry.

3 Q. (By Mr. McKeeby) Wait. Wait. Let  
4 me ask a question.

5 I've marked as Exhibit 1 what I  
6 understand to be your offer letter with  
7 ExecuTime; would you agree with that?

8 A. Yes. This looks about accurate,  
9 yes, sir.

10 Q. And it lists a start date of  
11 February 1st, 2016?

12 A. That is correct.

13 Q. Is that when you started with  
14 ExecuTime?

15 A. Yes.

16 Q. This lists your salary at \$45,000?

17 A. That is correct.

18 Q. On an annual basis?

19 A. Yes, sir.

20 Q. And it also mentions bonus  
21 opportunity?

22 A. It does, yes.

23 Q. Okay. And so is it your testimony  
24 that you -- your salary increased to 47,500 in  
25 June of 2016 when Tyler acquired ExecuTime?

1           A.           I don't know if it was June of  
2           2016, but it was right around the time that  
3           we were acquired.

4           Q.           How did you find out that your job  
5           title would be changed from project manager to  
6           implementation consultant?

7           A.           Management let us know.

8           Q.           Who?

9           A.           I believe it was Kathy, at that  
10          time.

11          Q.           And that's Kathy who?

12          A.           I can't think of her last name  
13          right now.

14          Q.           Okay. How did your duties change  
15          when you went from a project manager to  
16          implementation consultant?

17          A.           So with that as -- how Tyler  
18          actually does it is it breaks it up as two  
19          people on a team for a project. So you have  
20          the project manager who essentially leads the  
21          project, does majority of like the  
22          integration, they do the solution designs,  
23          the questionnaire, all of that, first direct  
24          contact with the actual client. Where at  
25          this point, now as an implementation

1 consultant, I would be primarily doing setup,  
2 training, as far as any troubleshooting once  
3 they start utilizing the application.

4 Q. Okay. So let me make sure I  
5 understand that, because that's going to be an  
6 important sort of piece of testimony that  
7 we'll come back to.

8 So there's an implementation  
9 process, if you will; correct?

10 A. Yes, sir.

11 Q. And I understand that the project  
12 manager handles the first part of that  
13 process?

14 A. Yes, sir.

15 Q. And then there's a handoff to the  
16 implementation consultant?

17 A. That is correct.

18 Q. Okay. And after that handoff, the  
19 implementation can -- it leads the remainder  
20 of the implementation processes?

21 A. To an extent, with, of course,  
22 the backup of the project manager for any  
23 questions, directions, things of that sort.

24 Q. But at that time, after the  
25 handoff, the implementation consultant is



1 having the direct client interface?

2 A. As far as meetings and the  
3 direct contact, are you referring to?

4 Q. Yes.

5 A. Yes, sir.

6 Q. I mean, the project manager might  
7 have -- continue to have some discussions with  
8 the client, but in terms of the majority of  
9 the on-site meetings for the training and for  
10 weekly -- or whatever periodic calls, that's  
11 something that the implementation consultant  
12 does after the handoff; correct?

13 A. That is correct.

14 Q. Okay. So you mentioned that at  
15 Tyler they would put two people on a team:  
16 One project manager and one implementation  
17 consultant; correct?

18 A. That is correct.

19 Q. Did they not -- was that not the  
20 way it was done before the Tyler acquisition?

21 A. No, it was not.

22 Q. So that the project manager was  
23 doing both roles at that point?

24 A. That is correct.

25 Q. So the change -- and we can go

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1 into more specifics if we need to, but at a  
2 general level, when you became an  
3 implementation consultant, you were no longer  
4 doing the project manager duties?

5 A. Essentially, no, I was not.

6 Q. Okay. Now, throughout your  
7 employment with ExecuTime and Tyler, you  
8 worked at home; correct?

9 A. That is correct.

10 Q. Did you report to a particular  
11 office?

12 A. I worked from home. I don't  
13 really understand. What do you mean, did I  
14 report?

15 Q. Was there -- there -- where was  
16 your -- who was your immediate supervisor at  
17 that point? Was that Ms. Burns?

18 A. Well --

19 Q. Initially?

20 A. Jamie Burns for part of the time  
21 and then Hillary. But Hillary actually  
22 worked remote and Jamie was at our home  
23 office, I guess you could say.

24 Q. That's in Little Rock?

25 A. That is correct, yes.

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1 Q. Where was Hillary located? North  
2 Carolina?

3 A. One of the Carolinas, yes.

4 Q. Was it North Carolina or do you  
5 know?

6 A. I'm not sure, it's one of the --  
7 either North or South.

8 Q. We will stick with one of the  
9 Carolinas.

10 A. Okay.

11 Q. So that's something that didn't  
12 change. Throughout your employment, you were  
13 always working out of your home?

14 A. That is correct.

15 Q. And did you understand that to be  
16 unique to you or was that typical of other  
17 implementation consultants?

18 A. A lot -- whoever did not live in  
19 Little Rock, Arkansas, worked from home. So  
20 we did have several people who worked from  
21 home.

22 Q. How many ExecuTime implementation  
23 consultants were there at any one time?

24 A. So they rotated a lot, because a  
25 lot of people left. I was the only one that

1 kind of stayed for a little while.

2 So we had kind of like a  
3 resolving door; there was a lot of people in  
4 and out, so it's kind of hard to say.

5 Q. All right. Were there ever more  
6 than ten implementation consultants?

7 A. No, sir.

8 Q. Was it ever any less than any four  
9 implementation consultants?

10 A. Yes.

11 Q. Okay. Now, am I correct that the  
12 team that you described, whether it be a  
13 project manager and implementation consultant,  
14 that setup, if you will, began as of the Tyler  
15 acquisition or shortly thereafter?

16 A. That is correct.

17 Q. And that wasn't project specific,  
18 was it? You were assigned or you were teamed  
19 with a project manager for periods of time  
20 until there was a change; correct?

21 A. Can you reword that question?  
22 Do you mean did I have the same project  
23 manager, is that what you're asking me?

24 Q. I think so. I understand you had  
25 different project managers.

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1 A. That is correct.

2 Q. But they weren't -- the -- that  
3 happened over time as opposed to as a result  
4 of being put on different implementation  
5 projects; correct?

6 A. So, it -- so first I had Hillary  
7 and she was promoted. So then they gave me  
8 another project manager. So I stayed with  
9 those project -- or excuse me, stayed with  
10 those project managers while I worked on  
11 projects.

12 Q. Okay. So you worked on multiple  
13 projects with each project manager?

14 A. Yes, sir.

15 Q. Maybe it's easier to go through --  
16 so Hillary was your first project manager,  
17 Hillary Pasch. Who was your second project  
18 manager?

19 A. Mikeya Henderson.

20 Q. And who was your next project  
21 manager?

22 A. Talia Harrison.

23 Q. That was your last one?

24 A. Yes.

25 Q. How did you find out about a

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1 position at ExecuTime?

2 A. Talia Harrison had told me about  
3 it.

4 Q. She was working there at that  
5 time?

6 A. She was, yes, sir.

7 Q. And she was a friend of yours?

8 A. She was, yes, sir.

9 Q. Where does she live?

10 A. I believe she moved to Memphis  
11 now, but she did live in Little Rock,  
12 Arkansas, for quite some time.

13 Q. Did you interview for a position?

14 A. I did, yes, sir.

15 Q. With whom did you interview?

16 A. Kathy.

17 Q. Last name we don't know?

18 A. Yes, I cannot remember it. I'm  
19 going to remember it though, and I'll tell  
20 you.

21 Q. How about this, if it's agreeable  
22 to counsel, we can put a blank at the -- in  
23 the transcript, and if you can remember her  
24 name, you can fill it in?

25 A. Yes, sir, okay. That works.

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1 Q. And if you can't remember, we'll  
2 leave it blank.

3 A. Okay.

4 Q. Did you fly to Little Rock for the  
5 interview?

6 A. I drove.

7 Q. Okay.

8 A. But that wasn't -- my first one  
9 was over Skype.

10 Q. Okay. That first one was with  
11 Kathy?

12 A. It was, yes, sir.

13 Q. Okay. And ultimately, you were  
14 presented with an offer letter that you signed  
15 on January 12th, 2016?

16 A. Yes, sir.

17 Q. What was your -- where were you  
18 employed before that?

19 A. Allconnect.

20 Q. What kind of company is that?

21 A. So it's primarily sales.

22 Q. Is it software?

23 A. No, it is not. This was  
24 actually my first time ever working with  
25 software.

1 Q. Okay. And the increase in salary  
2 you mentioned to 47,500, was that the only  
3 increase to your salary while you were  
4 employed with ExecuTime/Tyler?

5 A. That was not, no. I had another  
6 increase around -- it was about a year.  
7 Probably about a year ago, when Mikeya was  
8 promoted to project manager. The manager  
9 reached out to me and said I was doing a  
10 really good job and she wanted to give me an  
11 increase.

12 Q. What manager was that?

13 A. That was Hillary Pasch. Like,  
14 it wasn't a review time, it was just, hey,  
15 you're doing a great job, here's an increase.

16 Q. What was your increase to?

17 A. 48,500, I believe.

18 Q. And when was that?

19 A. It was --

20 Q. Approximately?

21 A. -- approximately, I would say --  
22 it was last year, 2018. I want to say around  
23 mid-year. It was around the same exact time  
24 Mikeya was changed to a project manager.

25 Q. Okay. When you started at



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1 ExecuTime, you understood that it was a  
2 salaried position?

3 A. Yes, sir.

4 Q. You understood that your salary  
5 plus any bonus would compensate you for all  
6 hours that you worked?

7 A. Yes, sir.

8 Q. You knew you wouldn't be getting  
9 overtime; correct?

10 A. That is correct.

11 Q. Is that something that you  
12 discussed with either Ms. Harrison or with  
13 anyone with whom you interviewed?

14 A. No, I didn't really bring it up.  
15 I didn't think twice about it, I guess you  
16 could say.

17 Q. Is it something that you ever made  
18 a complaint about during your employment at  
19 Tyler?

20 A. In regards to the overtime?

21 Q. Right.

22 A. No, sir.

23 Q. Did it ever cross your mind while  
24 you were employed at Tyler?

25 A. It did. But I felt like I had

1 never really had a salaried job before, so  
2 this was new to me, and I just felt like,  
3 hey, if I have to work 50, 55 hours or  
4 whatever the case may be for that week, then  
5 I need to get it done and my check is  
6 accordingly.

7 Q. Was there any specific occurrence  
8 or incident that made it cross your mind when  
9 it did?

10 A. In regards to the overtime?

11 Q. Right. In regards to thinking  
12 about -- you said you didn't complain about  
13 not receiving overtime, because it didn't  
14 really cross your mind.

15 At some point, you said, the  
16 concept of receiving overtime did cross your  
17 mind. And my question was simply, was there  
18 anything specific by way of a conversation or  
19 anything else that made it cross your mind  
20 when it did?

21 A. Not really. It was just I was  
22 working a lot. And I said, gosh, you know,  
23 being salaried, you sure do have to put in  
24 the work to get your check. But no, nothing  
25 specific you can say came up.

1 Q. Okay. Would you agree with me  
2 that after around June of 2016, when you  
3 became an implementation consultant, that your  
4 job duties were more or less the same for the  
5 remainder of your employment?

6 A. Now, are you referring to my  
7 implementation consultant role from when we  
8 were bought out from Tyler until the day that  
9 I actually left or?

10 Q. I think the answer to that  
11 question is yes.

12 A. Okay.

13 Q. But let me ask it in a different  
14 way to make sure we're on the same page.

15 A. Yes, sir.

16 Q. I understand that at some point  
17 your title was changed from project manager to  
18 implementation consultant; right?

19 A. Yes, sir.

20 Q. And that coincided with the  
21 acquisition of ExecuTime by Tyler; correct?

22 A. Yes, sir.

23 Q. So and we think that was around  
24 June of 2016?

25 A. Yes, sir.

1 Q. And I think you told me earlier,  
2 to be fair, that it wasn't exactly -- the  
3 title change didn't occur exactly with the  
4 acquisition, but occurred, you know, maybe a  
5 few weeks or even a month thereafter; correct?

6 A. Right, it was right around the  
7 time, yes.

8 Q. So right around the time. But  
9 once that happened, once you became an  
10 implementation consultant, is it fair to say  
11 that your duties remained the same for the  
12 duration of your employment?

13 A. For the most part, yes.

14 Q. Right.

15 A. But not completely.

16 Q. And why do you -- why -- how did  
17 they change, if they did?

18 A. So towards the end, they were  
19 trying to put more responsibilities on the  
20 implementation consultant, which we weren't  
21 doing prior to, in regards to, like,  
22 uploading files with integration information.  
23 So the initial integration was still  
24 something we did not handle -- or like the  
25 technical stuff. But we started doing, like,

1 integrating their, for example, employees'  
2 names, like uploading a file, so to say, with  
3 the employees' names and things of that sort,  
4 which we weren't really doing before; that  
5 was the project manager.

6 Q. When did that happen?

7 A. That happened right around the  
8 time I got trained for the first time, which  
9 was January, 2019. Around that time.

10 Q. When you say the first time that  
11 you got trained, you mean the first time that  
12 you got trained on these additional  
13 responsibilities?

14 A. No. So initially -- and this  
15 was something that I had brought up to my  
16 managers multiple times, was I never got  
17 trained and this was new to me.

18 So it was basically, listen to  
19 the videos, figure it out, sink or swim.  
20 There was not a structure, so to say, of  
21 training. And Hillary continued to bring up  
22 the amount that I needed to rely on my  
23 project manager for certain items and I  
24 explained to her, I was never trained. Like,  
25 I need someone to really sit down and train

1 me on the process and what I'm supposed to  
2 do.

3 And at that time, they flew  
4 Talia Harrison out to Atlanta, January 2019,  
5 to actually go through the actual process  
6 step by step as well as, at that time, we  
7 discussed me starting to handle uploading  
8 files and things of that sort.

9 Q. Okay. So you met with Talia  
10 Harrison and she gave you general training on  
11 the role of implementation consultant and also  
12 these new responsibilities that were going to  
13 be added; correct?

14 A. Yes, that's correct.

15 Q. Where did that training take  
16 place?

17 A. In Atlanta, Georgia, right here.

18 Q. Where?

19 A. At my house.

20 Q. How long was the training?

21 A. It was about a week. So she  
22 flew out on Monday, flew back on Friday. So  
23 she was here for a week, but really about  
24 three full days.

25 Q. And that was training that you

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1 requested?

2 A. Yes.

3 Q. Did you receive any on-the-job  
4 training?

5 A. What do you mean by on-the-job  
6 training?

7 Q. Let me ask it a different way.

8 A. I'm sorry.

9 Q. Did the -- what was the first  
10 implementation for which you were a project  
11 manager?

12 A. I don't recall the first one I  
13 was --

14 Q. Okay. Did you do it on your own  
15 or with assistance?

16 A. No, I had assistance.

17 Q. Okay. How many, approximately,  
18 did you -- implementations did you serve as  
19 the project manager on with assistance?

20 A. Well, I only did that for a few  
21 months. So I didn't really have any that I  
22 went with completely no assistance, I guess  
23 you could say. I still had to reach out  
24 because I was a new employee at that time as  
25 well.

1 Q. Right. But was there another  
2 project manager who you worked with during  
3 that period on these first implementations?

4 A. John Jenkins, he was the manager  
5 over advanced scheduling.

6 Q. So he sort of was a co-project  
7 manager with you during this initial period?

8 A. Yeah, when I first started.  
9 Like, he was kind of, you know, guiding me in  
10 regards to -- because a lot of it was, like,  
11 police terms and things that I was not  
12 familiar with, and he was a cop forever, so.

13 Q. Okay. Okay.

14 Let me step back a little bit and  
15 ask some kind of more basic questions.

16 The customers who purchased  
17 ExecuTime are government entities; correct?

18 A. That is correct.

19 Q. States and municipalities?

20 A. That is correct.

21 Q. And one of the things that they're  
22 purchasing is the actual software; correct?

23 A. Yes.

24 Q. The -- either the advanced  
25 scheduling or the time and attendance software



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1 or in some cases both?

2 A. I believe -- and I could be  
3 wrong, because I don't do sales, I believe  
4 you have to have time and attendance to do  
5 advanced scheduling, though.

6 Q. Right. But you wouldn't  
7 necessarily have to have time and  
8 attendance -- or I'm sorry, you wouldn't --  
9 you could have time and attendance only?

10 A. Yes.

11 Q. Okay. And you did not create the  
12 software; correct?

13 A. No.

14 Q. You're not a technical person, you  
15 said?

16 A. No, sir.

17 Q. Is that correct?

18 A. That is correct.

19 Q. Sometimes we'll get a double  
20 negative and I'll need to clear that up as I  
21 just did there.

22 A. No problem.

23 Q. The software is something that  
24 developers created?

25 A. Yes, sir.

1 Q. You supported the software, I've  
2 used that term, in the sense of your duties as  
3 an implementation consultant?

4 A. When you say support?

5 Q. Well, you're -- obviously, your  
6 job duty functions related in some way to the  
7 software in terms of teaching it through  
8 training, some of the integration work that  
9 you mentioned was related, at least at some  
10 level, to the software?

11 A. Yes, that is correct.

12 Q. At a general level, you worked  
13 with the software?

14 A. That is correct.

15 Q. But you did not create the  
16 software?

17 A. Yes, that is correct.

18 Q. Okay. And you also didn't sell  
19 the software; correct?

20 A. No, I did not. That is correct.

21 Q. Okay. I take it that even before  
22 the acquisition, ExecuTime had a sales team?

23 A. That is correct.

24 Q. And the sales team would be the  
25 one that would pitch and market the software

1 independent of anything that you as either a  
2 project manager or implementation consultant  
3 would do; correct?

4 A. Yes, sir.

5 Q. Back to your offer letter, if I  
6 asked this, I apologize. You understood that  
7 as a salaried employee, you would receive the  
8 same compensation no matter how many hours you  
9 worked during a particular pay period;

10 correct?

11 A. That was my understanding, yes,  
12 sir.

13 Q. And that was, in fact, the case;  
14 correct?

15 A. Yes, sir.

16 Q. One of the rules of depositions  
17 that I neglected to tell is that if you need a  
18 break at any time during the deposition, you  
19 can take one.

20 A. Okay, thank you.

21 Q. But the other rule is that  
22 sometimes I'm going to need a break, like  
23 right now.

24 A. Okay, no worries.

25 MR. MCKEEBY: Is it okay if we

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1 take a break?

2 MR. HERRINGTON: Sure. Thank  
3 you.

4 THE VIDEOGRAPHER: Going off the  
5 record at 10:39.

6 (A short break was taken.)

7 THE VIDEOGRAPHER: We are back on  
8 the record at 10:50 a.m.

9 Q. (By Mr. McKeeby) Okay. Back on  
10 the record. Ms. Greene, you understand you're  
11 still under oath?

12 A. Yes, sir.

13 Q. Do you -- did you graduate from  
14 college?

15 A. I did not.

16 Q. Have you ever attended college?

17 A. I have, yes.

18 Q. How many years?

19 A. About one.

20 Q. Where was that?

21 A. In Delaware, Del Tech.

22 Q. Have you -- when was that one  
23 year?

24 A. Geez. When I got out of high  
25 school. So that would have been, like, 2002,

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1 2003ish.

2 Q. Other than associated with  
3 employment, since 2002, have you had any other  
4 education in terms of classes or curriculums  
5 or courses?

6 A. I took a real estate class. I  
7 mean, nothing like technical or towards this  
8 job, but....

9 Q. And how -- are you currently  
10 employed?

11 A. Yes, sir.

12 Q. With whom?

13 A. With O'Ryan.

14 Q. What kind of company is that?

15 A. It's similar as far as software  
16 is concerned.

17 Q. What type of software do they  
18 provide?

19 A. So they provide law management  
20 software that deals more with, like, the  
21 accounting aspect of things, not so much,  
22 like, time and attendance, like this job.

23 Q. Okay.

24 MR. HERRINGTON: She can get you a  
25 good deal.

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1 Q. (By Mr. McKeeby) So your  
2 clients -- I assume you anticipated my next  
3 question. Your clients are no longer  
4 government entities, I take it, since -- at  
5 O'Ryan?

6 A. That is correct, yes, sir.

7 Q. They're law firms?

8 A. That is correct.

9 Q. And are you -- what's your  
10 position?

11 A. I'm a project manager here.

12 Q. Do you work out of your home?

13 A. I do not, no, sir.

14 Q. What office do you report to?

15 A. Right in Marietta.

16 Q. And when did you first start  
17 working at O'Ryan?

18 A. June of this year.

19 Q. And are you paid salary or by the  
20 hour at O'Ryan?

21 A. I'm paid salary.

22 Q. Do you receive overtime?

23 A. I do not, no, sir.

24 Q. What's your salary?

25 A. It's 60,000.

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1 Q. And I take it you interviewed for  
2 a position at O'Ryan?

3 A. I did, yes, sir.

4 Q. And did you present them with a  
5 copy of your resume?

6 A. Yes. Excuse me, let me actually  
7 back up a little bit. I didn't give them the  
8 copy of the resume there. I had applied on  
9 Indeed and uploaded the copy of my resume on  
10 Indeed. So they received my resume from  
11 Indeed.

12 Q. Thank you for --

13 A. Yes.

14 Q. -- that correction.

15 (Whereupon, Exhibit 2 was marked  
16 for identification.)

17 Q. (By Mr. McKeeby) I've marked as  
18 Deposition Exhibit 2 what's been produced in  
19 this case as your resume. Would you agree  
20 with that characterization?

21 A. Yes, sir.

22 Q. Is this, as far as you know, a  
23 true and correct copy of the resume that you  
24 presented to O'Ryan in connection with your  
25 employment?

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1 A. Yes, sir.

2 Q. And did you present this -- well,  
3 I don't know how to honor your correction. Do  
4 you have an understanding that this resume was  
5 presented to other employers as well or just  
6 O'Ryan?

7 A. I don't understand that  
8 question, I'm sorry.

9 Q. You uploaded a resume on Indeed, a  
10 job site service; correct?

11 A. Yes, sir.

12 Q. This is the resume that you  
13 uploaded?

14 A. Yes, sir.

15 Q. Were there any other versions of  
16 the resume that you utilized since your  
17 employment with Tyler other than this  
18 document?

19 A. No, sir.

20 Q. Did you actually provide this  
21 resume to any employers other than through  
22 Indeed?

23 A. No -- hold on, let me back that  
24 up. Because I also uploaded this on  
25 LinkedIn. So then, I guess that would also



1 technically count for other people getting it  
2 off of Indeed.

3 Q. So you uploaded the resume on  
4 LinkedIn as well as Indeed?

5 A. Yes, sir.

6 Q. And I guess you would agree with  
7 me that the resume is truthful and accurate?

8 A. Yes, sir.

9 Q. Is -- in terms of your job duties,  
10 I understand it's a different kind of software  
11 with a different kind of client. But is the  
12 project manager position that you have with  
13 O'Ryan similar to the project manager position  
14 that you had during the first several months  
15 of your employment with ExecuTime before the  
16 Tyler acquisition?

17 A. Similar in what ways?

18 Q. Any ways?

19 A. So in certain ways, yes, because  
20 I am -- I'm actually managing the projects  
21 with this company, I'm not assisting.

22 Q. Okay. And you were assisting  
23 while you were at ExecuTime because you were  
24 new, as you testified to, and Mr. Jenkins and  
25 you worked together; correct?

1           A.           And there was Jason Eps, he  
2           worked along -- just if I had questions and  
3           stuff, I would reach out to them. Because  
4           keep in mind, when I was on the advanced  
5           scheduling side, there was a lot of police  
6           questions that would come up, fire department  
7           questions that I was not familiar with how to  
8           answer or even approach those.

9           Q.           As a project manager at O'Ryan,  
10          are you doing any of the roles that you  
11          performed as an implementation consultant when  
12          you were with Tyler?

13          A.           Yes, sir.

14          Q.           What functions are those?

15          A.           Like, the training aspect of  
16          things.

17          Q.           What else?

18          A.           The initial setup based off of  
19          the client's policies and procedures.

20          Q.           That's something you do at O'Ryan  
21          and that's something you did as an  
22          implementation consultant at Tyler?

23          A.           Yes. The initial setup, yes,  
24          sir.

25          Q.           And you said initial setup of the

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1 client's information or?

2 A. That is correct.

3 Q. What other tasks or duties do you  
4 have at O'Ryan that you also had as an  
5 implementation consultant at Tyler?

6 A. That's about it, is training and  
7 the initial setup. Because now, of course,  
8 I'm doing more with my new role.

9 Q. Right. So that wouldn't be  
10 responsive to my question.

11 A. Yes, sir.

12 Q. So in terms of the different job  
13 functions as an implementation consultant at  
14 Tyler, we've covered -- we've mentioned -- I  
15 shouldn't say we've covered -- but we  
16 mentioned training and we mentioned the  
17 initial setup. What other duties and  
18 responsibilities did you have as an  
19 implementation consultant?

20 A. I did either weekly or biweekly  
21 calls with the client.

22 Q. Okay.

23 A. I also did certain levels of  
24 troubleshooting if they ran into issues  
25 while, you know, utilizing the software, of

1 course.

2 Q. What else?

3 A. Um --

4 Q. Travel?

5 A. Yes, yes, sir. And I would  
6 travel and do those specific things, like go  
7 train people and travel, yes.

8 Q. Right. Obviously, you're  
9 traveling to do some of these things, but  
10 you're also traveling as part of your job?

11 A. Yes, sir.

12 Q. What other duties did you have,  
13 again, just sort of listing them by category?  
14 Are there any other duties?

15 A. Not that I can think of off the  
16 top of my head.

17 Q. We can come back to it if we need  
18 to.

19 A. Okay.

20 Q. Just so that we're clear, are you  
21 comfortable if I refer to the ExecuTime  
22 software -- you mentioned that it's divided  
23 between time and attendance -- the time and  
24 attendance module and the advanced scheduling  
25 module. But it all relates to payroll;

1 correct?

2 A. Essentially, that is the end  
3 result, is producing the actual payroll.

4 Q. I mean, that's what the objective  
5 of the software is, to make sure the payroll  
6 is done properly; correct?

7 A. So we don't actually do the  
8 payroll portion, but to make sure that the  
9 time is accurate, yes.

10 Q. And the time needs to be accurate  
11 because if it's not, then the compensation  
12 won't be accurate?

13 A. That is correct.

14 Q. So you would agree with me that --  
15 that it was critical that the software be --  
16 that the software perform correctly?

17 A. Yes, sir.

18 Q. And, for example, as I understand  
19 it, before you could quote, Go-Live, unquote  
20 with the software, you actually had to have  
21 two test runs before the hand to make sure the  
22 software was operating properly; correct?

23 A. That is correct.

24 Q. And the concept of going live,  
25 tell me what that means.

1           A.           So once the client actually goes  
2     live, then they are no longer doing, like,  
3     what you would call a parallel test. So a  
4     parallel test would be when they're using our  
5     application, the ExecuTime application as  
6     well as however they were currently doing to  
7     basically parallel test to make sure it was  
8     accurate.

9                       Once they're actually live, they  
10    only utilize ExecuTime software for clocking  
11    in, clocking out, adding time, things of that  
12    nature.

13          Q.          And therefore, at that point, when  
14    they went live, it was critical that the  
15    software was being operating correctly?

16          A.          Yes, sir.

17          Q.          And so the certain level of  
18    troubleshooting that you mentioned, that would  
19    have occurred, obviously, before the customer  
20    went live?

21          A.          Yes, sir. That is correct.  
22    Now, sometimes there may be a situation where  
23    something may come up, you know, on their  
24    Go-Live or after, of course, but majority of  
25    troubleshooting was within the parallel

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1 testing, for the most part.

2 Q. Did you ever have a situation  
3 after Go-Live when the software didn't work  
4 properly that you were involved in while you  
5 were at Tyler?

6 A. After the Go-Live? I'm just --  
7 I'm trying to just think if there were any  
8 situations, because essentially, once they  
9 Go-Live, they go over to support. So I don't  
10 deal with them, once they go to support,  
11 they're off my plate and I'm completely done  
12 with them.

13 Q. And there's a concept of being  
14 passed to support; correct?

15 A. Yes, sir.

16 Q. And that's at the end of the  
17 implementation process?

18 A. Yes, sir.

19 Q. And is that before or after  
20 Go-Live?

21 A. After Go-Live, the project  
22 manager then steps up to transfer them over  
23 to support.

24 Q. And the project manager would  
25 consult with you in connection with passing

1 the client to support; correct?

2 A. Yeah. Well, they're involved  
3 the whole way, so they know where the client  
4 is. And because we were in so much contact  
5 with different scenarios, when I would reach  
6 out to the project manager, they knew where  
7 the client was, you know, the whole time  
8 through parallel testing and stuff.

9 Q. They knew -- the project manager  
10 would know based on communications from you?

11 A. That is correct, yes, sir.

12 Q. And so you would be updating the  
13 project manager periodically about how the  
14 implementation was going, were they meeting  
15 deadlines, were they ready to be passed to  
16 support, that type of thing?

17 A. Yes. And the project manager  
18 also -- so different project managers handle  
19 it currently.

20 Q. Okay.

21 A. When I was with Talia, she would  
22 request and receive all of the checklists  
23 throughout the process. So she knew very  
24 well where everyone was at, because she's  
25 requesting the documents that are needed to



1 sign off.

2 Q. And being passed to support, is  
3 something that's communicated to the client;  
4 correct?

5 A. Yes, sir.

6 Q. And that's a phone call; correct?

7 A. Or an e-mail.

8 Q. Or an e-mail?

9 A. Yes.

10 Q. If it was a phone call, would you  
11 be typically on the line as the implementation  
12 consultant?

13 A. On the pass to support call --  
14 and excuse me, were you asking was it a phone  
15 call when they actually transition or when  
16 we're scheduling them to transition? My  
17 apologies.

18 Q. That's okay. That's a fine  
19 distinction. I'm -- was referring more to  
20 what I think is the former, when they're  
21 passed to support, is there a phone call with  
22 the client or a communication with the client  
23 saying, hey, you're through with the  
24 implementation process, we're now passing you  
25 to support?

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1 A. Yes, sir.

2 Q. Okay. And would you be on that  
3 call typically?

4 A. I just started being on those  
5 calls probably around December or January,  
6 but before, no, I was never on those calls.

7 Q. And just so we're clear, support  
8 is a different service that the client  
9 purchases when they buy the ExecuTime  
10 software; correct?

11 A. I'm not sure how that goes on  
12 the sales side.

13 Q. Okay. But you know -- you would  
14 review the client contracts as part of your  
15 preparation for particular implementations;  
16 correct?

17 A. Yes, sir.

18 Q. But those contracts didn't discuss  
19 support or you just don't remember?

20 A. I don't recall. That may have  
21 been something that was just included, but  
22 I -- honestly, I'm not sure.

23 Q. And did you have discussions with  
24 your project managers about where clients were  
25 as to whether or not they were ready to be

1 passed through support?

2 A. Yes.

3 Q. And what would that be based on?

4 A. If there were any issues that  
5 they ran into, if the time wasn't matching up  
6 correctly, I mean, there could be numerous  
7 different things that could prevent a  
8 Go-Live.

9 Q. Well, I'm not talking about a  
10 Go-Live, I don't think. I was saying, okay,  
11 being passed to support -- which I understood  
12 occurred after Go-Live?

13 A. Right. So essentially you have  
14 to Go-Live to go to support. So my  
15 apologies.

16 Q. No, that's all right. But I'm  
17 going to make sure you were answering the  
18 question you thought you were answering. So  
19 in order to be passed to support, you had to  
20 make sure that there were no technical issues,  
21 I guess?

22 A. Yes, sir, that's correct.

23 Q. Okay. And you would discuss those  
24 issues with the project manager?

25 A. If needed, yes.

1 Q. Okay. Did you -- what else had to  
2 be done to pass the client to support after  
3 the Go-Live?

4 A. Well, they had to have all of  
5 their checklists in. So through each -- I  
6 guess you could say, item they needed to  
7 complete, a checklist needed to be completed  
8 as well.

9 Q. And their employees had to know  
10 how to use the software; correct?

11 A. Yes, that is correct.

12 Q. Were there ever any instances  
13 where you -- well, I guess if the employees  
14 weren't properly trained on the software, they  
15 wouldn't be in a position to Go-Live in the  
16 first place; correct?

17 A. Well, not necessarily, because  
18 sometimes they only do certain groups. So  
19 they may not -- I'm just -- let's just say  
20 that we did the City of Atlanta, they may not  
21 have the entire City Go-Live that first  
22 group. They may only do one department or  
23 two departments and then start, you know,  
24 bringing everyone else in as they're using  
25 the software.

1 Q. Right. Okay.

2 But -- all right. So maybe I  
3 didn't ask it precisely enough. But what --  
4 whether it be a particular department or the  
5 client as a whole -- and I guess that would  
6 depend on the particular implementation -- but  
7 in either case, was there ever any instance  
8 where the training wasn't going as well as it  
9 could have to warrant going live?

10 A. When you say the training wasn't  
11 going as well as it could have?

12 Q. The people weren't getting it.  
13 You know, there was a Go-Live date that's part  
14 of the -- I don't know is it part of the  
15 checklist?

16 A. It is, yes. It is part of the  
17 checklist as well.

18 Q. So when you say checklist -- I'm  
19 going a little bit off track here, but the  
20 checklist is something that you drafted?

21 A. No.

22 Q. Okay. The project manager  
23 drafted?

24 A. That is correct. It's part of  
25 their project plan.

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1 Q. And the project plan has various  
2 deadlines?

3 A. That the project manager does,  
4 yes.

5 Q. Okay. For training?

6 A. Uh-huh.

7 Q. For integration?

8 A. (Nodding.)

9 Q. Yes?

10 A. That is correct, yes, and the  
11 project manager sets all of those dates.

12 Q. Okay. So that's a checklist that  
13 you have when you take over -- when the  
14 implementation is handed off to you?

15 A. I can see the dates, yes.

16 Q. Were there any situations where  
17 you had to -- you being Tyler, had to postpone  
18 a Go-Live date?

19 A. Oh, yes, for sure. That was not  
20 uncommon.

21 Q. That could be the result of  
22 technical issues?

23 A. Could be -- it could be  
24 technical issues, it could be time not adding  
25 up. It could be they just need more time. I

1 mean, it could vary on numerous different  
2 things.

3 Q. Need more time to do what?

4 A. To maybe, you know, get more  
5 people in the application or whatever it is  
6 that they may need more time for. Sometimes  
7 they have other things coming up or other  
8 projects, things of that sort.

9 Q. And that could, for example, delay  
10 the training?

11 A. It could, yes, sir.

12 Q. Did you ever have a situation  
13 where you delayed a Go-Live date because the  
14 training wasn't going well in the sense that  
15 the users -- I know there's power users and  
16 end users, but in situations where the users  
17 weren't picking up on the training as well as  
18 you thought they should have?

19 A. I mean, there has been  
20 situations; like there was one client where  
21 it was majority older -- I guess you could  
22 say seasoned people.

23 Q. Fair enough.

24 A. And with that, a lot of them  
25 didn't even know how to work, like, smart

1 phones. I actually had to go on site and do  
2 a little bit more hand holding. So depending  
3 on the client, situations like that could  
4 happen, yes.

5 Q. What client was that?

6 A. Alexander County, they were in  
7 North Carolina.

8 Q. Okay. Did you have to delay the  
9 Go-Live date with them?

10 A. They drug their feet for a  
11 while. They were actually around for a  
12 couple of years because they were -- how is a  
13 nice way to put this. They were kind of  
14 doing their time, like, old school, where  
15 they were writing it all down on paper and --  
16 yeah.

17 Q. But that's a situation where the  
18 Go-Live date had to be changed?

19 A. Yeah, multiple times with them,  
20 they were around for a while. They kept  
21 putting it on -- because what you can do is  
22 but a project on hold, quote, unquote, where  
23 you basically put it on hold and then you  
24 pick back up when the client's ready.

25 Q. And is that a situation where you



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1 went to the customer's location to do what  
2 I'll call on-site training?

3 A. Once I went on site, we were  
4 able to move through with the actual project.  
5 But I did go on site for them, yes.

6 Q. Was it -- on that project  
7 specifically, was it not originally  
8 contemplated that you would be going on site?

9 A. I'm not sure. The project  
10 manager discusses all of that.

11 Q. Okay. Did you report to the  
12 project manager what you observed in terms of  
13 the training in that example?

14 A. Well, with that actual training,  
15 I only went on site for the power user  
16 training.

17 Q. Okay.

18 A. But yeah, I let her know they  
19 were elder and they were -- seasoned, I'm  
20 sorry, they were having a little bit harder  
21 time using the software.

22 Q. Got it.

23 And that ultimately resulted in a  
24 delay of the original Go-Live date?

25 A. Well, yeah, but they were --

1     once I got them, they had already been  
2     lingering for about a year and a half with  
3     ExecuTime.

4             Q.        Okay. But was it -- was there  
5     another Go-Live date that had to be postponed  
6     as a result of them being slow learners of  
7     having trouble using the software, for  
8     whatever reason, be it their seasonedness or  
9     otherwise?

10            A.        Yeah. I want to say we had to  
11     push it out slightly, but it wasn't like  
12     another year or anything. They just needed a  
13     little bit more time to work in the  
14     application.

15            Q.        Did -- what was the -- maybe a  
16     question that you can't answer but I'll ask  
17     it. Was there a typical duration of  
18     implementation process?

19            A.        Typically, yes, about 120 days.

20            Q.        Okay. Now, does that 120 -- I  
21     understand that's going to vary depending on  
22     some of the factors that we've already touched  
23     on. Is that a period that would be set forth  
24     in the contract?

25            A.        I'm not sure they put it in the

1 contract.

2 Q. When you say 120 days, does that  
3 account for the time that the project manager  
4 is in charge of the process and after the  
5 handoff to the implementation consultant?

6 A. Yes, sir.

7 Q. Okay. Of that 120 days, how much  
8 is devoted or how much is -- how much time is  
9 the project manager in charge of before the  
10 handoff?

11 A. I'm not sure exactly how long  
12 they would have it.

13 Q. Approximately?

14 A. Maybe -- it depends because  
15 integration -- because they do a lot of more  
16 of the back-end stuff. So when it comes to  
17 that, sometimes they would have projects for  
18 longer, because I don't really know the exact  
19 time the project manager would start working  
20 on that. So it's hard for me to answer that  
21 question.

22 Q. Fair enough. I thought it might  
23 be. So -- but at some point during that  
24 typically 120 days, there is a handoff to the  
25 implementation consultant?

1 A. That is correct, yes, sir.

2 Q. Which would be you?

3 A. Yes.

4 Q. And that occurs during a -- is  
5 there something called a handoff call with a  
6 client at that point?

7 A. So essentially -- and different  
8 project managers would handle it different --  
9 the most recent, generally, we would do like  
10 a call where I would sit in on the call and  
11 she would introduce me as well, and I would,  
12 you know, meet the client and all of that  
13 good stuff and then we would discuss next  
14 steps.

15 Q. Okay. And the client, would  
16 that -- obviously referring, at some level, to  
17 a state or municipality, was there a  
18 particular title at the client with whom you  
19 would typically coordinate -- a project  
20 manager?

21 A. They would have project managers  
22 most of the time. You know, every client is  
23 a little different. So sometimes we would  
24 deal with, like, HR managers or payroll  
25 supervisors, or there would be different

1 people on the team.

2 Q. Okay. So it might be more than  
3 one person?

4 A. Yes, sir.

5 Q. So the different phases of the  
6 implementation that you mentioned earlier, the  
7 training, the initial setup, the weekly calls,  
8 the travel, and the certain levels of  
9 troubleshooting that you performed as an  
10 implementation consultant, am I right that all  
11 of that would occur after the handoff?

12 A. Yes, that is correct.

13 Q. Okay. And I guess the amount of  
14 time that you would have to -- to -- to do  
15 those -- perform those roles, would depend on  
16 the timing of the handoff?

17 A. As well as the timing that the  
18 project manager put together in the project  
19 plan.

20 Q. How would you -- let me ask you  
21 this: I know you listed those different  
22 categories of tasks. The training, the  
23 initial setup, the weekly calls, the  
24 troubleshooting and the travel. Is there an  
25 order in which they would occur, typically?

1           A.           So essentially, when I get the  
2           actual client, I go through with the client  
3           and do, like, a power user training. And --  
4           excuse me, let me back up.

5                       Prior to the power user  
6           training, I go through the questionnaire and  
7           the solution design that the project manager  
8           had put together from the actual client. So  
9           I go through the information that they have  
10          gathered based on their specific policies and  
11          procedures.

12          Q.          Based on the client's specific  
13          policies and procedures?

14          A.          Yes, sir, that is correct. So  
15          based on the client's specific policies and  
16          procedures, and then I would do --

17          Q.          Now, what are you reviewing? I'm  
18          sorry to interrupt.

19          A.          The questionnaire and the  
20          solution design that the project manager put  
21          together with the client.

22          Q.          Okay.

23          A.          So they went through a series of  
24          questions with them and kind of noted, you  
25          know, everything down.

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1 Q. These are two separate documents?

2 A. Yes, sir.

3 Q. You would review those -- is this  
4 after handoff or before handoff?

5 A. This would be around the time of  
6 handoff, I would go through the documents.

7 Q. What would be your objective in  
8 reviewing the questionnaire and the solution  
9 design?

10 A. To see what their policies are  
11 and how the application needs to be set up.  
12 Because there are certain things that I would  
13 need to turn on -- like, in the system admin  
14 preferences, I guess we can call it, like the  
15 preferences option, where, for example, maybe  
16 some places use comp time and some places do  
17 not. It's as simple as going under the  
18 preferences and checking a box to allow them  
19 to actually use it.

20 Q. And you would know from the  
21 questionnaire -- or I guess both the  
22 questionnaire and the solution design, for  
23 example, whether or not this particular client  
24 used comp time?

25 A. Yes, sir.

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1 Q. And that would affect the initial  
2 setup?

3 A. Yes, sir.

4 Q. Would that be the next thing you  
5 would do in the process, would the initial  
6 setup?

7 A. Yes, once I go through the  
8 solution design and the questionnaire, then I  
9 do pretty much like a generic setup so to  
10 say, based off of their solution design for  
11 the power admin training that I'm going to do  
12 with them. Because I want to allow them to  
13 be able to see how they would use the  
14 software.

15 Q. Okay. And then would the next  
16 step in the process typically be the power  
17 admin training?

18 A. Yes, sir. Typically, yes.

19 Q. And that could occur either  
20 remotely or on site; correct?

21 A. Yes, depending on what the  
22 client and the project manager discussed.

23 Q. In terms of the implementations  
24 that you performed, generally -- or  
25 approximately, what percentage were remote



1 versus on site, in terms of the training?

2 A. So some clients would only do  
3 power admin on site. And then they would  
4 split up and do some of the end user, super  
5 user remote. Some would do it vice versa.  
6 So it really depends.

7 I would guesstimating about 40  
8 percent of them would go -- like 30 to 40  
9 would do onsite on different portions of the  
10 training.

11 Q. Okay. So -- so I think you  
12 answered my question but I want to make sure.  
13 So of all of the implementations that you did  
14 at Tyler, you were actually at the customer  
15 location approximately 30 to 40 percent of the  
16 time?

17 A. Around that, yes, sir.

18 Q. Okay. And the reason that you  
19 were on site could vary too, but typically  
20 would involve power user training?

21 A. Typically, yes, sir.

22 Q. And it may or may not involve end  
23 user and super user training?

24 A. Yes, sir.

25 Q. Okay. So I guess the -- we've

1 talked about the different -- well, we've  
2 talked about the power training -- the power  
3 admin training. And then I guess the  
4 troubleshooting that you discussed or  
5 mentioned, that kind of occurs throughout the  
6 process; is that fair?

7 A. Yes, sir. Yes.

8 Q. As does -- obviously, the travel  
9 happens before the power user training,  
10 assuming you're doing that on site? And it  
11 happens afterward, I guess? Well, we --

12 A. As far as the troubleshooting is  
13 concerned?

14 Q. No, no. I'm talking about just in  
15 terms of the different categories of functions  
16 that we listed. We listed training, initial  
17 setup, weekly calls, certain level of  
18 troubleshooting and travel, is what you  
19 mentioned. And I'm trying to now, get a sense  
20 of what -- in what order those occurred --

21 A. Okay.

22 Q. -- and you've told me -- well,  
23 first, you looked at the questionnaire and the  
24 solution design. And that was at or around  
25 the time that you had the handoff call.

1 A. (Nodding.)

2 Q. And then there was the initial  
3 setup process. Then there was the training.  
4 And my question is: I take it that that --  
5 that the troubleshooting that you mentioned  
6 occurs kind of throughout the process, not at  
7 one particular time necessarily?

8 A. Yes, sir. Now, majority of it  
9 is towards the parallel testing, but of  
10 course, we may run into -- you know, little  
11 things here and there that I may have to  
12 troubleshoot along the way as well.

13 Q. So does the parallel testing  
14 typically occur after the training?

15 A. Yes, sir.

16 Q. Okay.

17 A. After the end user, super user  
18 training. Because that's when the actual  
19 employees will start utilizing the  
20 application.

21 Q. Okay. Okay. What's a power user?

22 A. So the power user training would  
23 be with the higher ups like their project  
24 manager, possibly the head of their payroll,  
25 if they're -- you know, doing the project

1 alongside with the project manager. Possibly  
2 the HR manager. It's the higher ups who can  
3 actually make decisions on how they would  
4 like to use the application.

5 Q. And those are decisions that the  
6 client obviously makes?

7 A. Yes, sir.

8 Q. Those decisions are based on the  
9 training that they get, in part?

10 A. Well, it's based off of -- and  
11 when you say those decisions --

12 Q. Well, you said -- mentioned how  
13 they wanted to use the software, was this  
14 something that the client had to decide?

15 A. Yes, sir. So an example of that  
16 would be more so, let's say that City of  
17 Atlanta is using comp time. Okay. So a  
18 decision that may need to make is how do you  
19 want to use the comp time within the  
20 application? Would you like it to  
21 automatically populate once they exceed 40  
22 hours? Would you like them to submit a time  
23 off request for that comp time? Would you  
24 like them to just send their supervisor an  
25 e-mail? So it would be -- internally they

1 would decide how do they want to handle  
2 certain situations like that.

3 Q. And they would communicate that  
4 decision to you?

5 A. Absolutely, yes, sir.

6 Q. And I take it they would typically  
7 communicate the decision to you after the  
8 training, once they knew what the options  
9 were?

10 A. Yes. Yes, sir.

11 Q. And did they -- did -- I guess  
12 different clients had different preferences  
13 about how to do it in the example that you  
14 gave of comp time?

15 A. Yes, sir. And some of them  
16 would determine it like as soon as they  
17 talked to the project managers. Some of them  
18 would determine and say, hey, we just want to  
19 automatically populate this.

20 Q. Okay. Would they ever ask you for  
21 recommendations on how to do it? How you've  
22 done it before or what are other people doing,  
23 anything like that?

24 A. Well, they would sometimes ask,  
25 you know, how do other agencies? It's not a

1 super common question, though, because a lot  
2 of agencies know how they want to do things  
3 like that, because they've been doing a  
4 certain process for so many years.

5 Q. Okay. Okay. What happens after  
6 parallel -- I'm sorry. Back up. What's --  
7 under user training, I take it, are the actual  
8 people that are inputting time?

9 A. Employees and supervisors, yes,  
10 sir.

11 Q. Okay. And then super user  
12 training?

13 A. And I'm sorry. Supervisors  
14 would sit in on the end user training and the  
15 employees and then the super users only for  
16 the supervisors.

17 Q. I see. So super user training  
18 refers to supervisor training?

19 A. Yes, sir.

20 Q. Now, did every implementation  
21 contain power user training, end user training  
22 and super user training?

23 A. Yes, sir.

24 Q. Okay. And they would always be  
25 separate?

1           A.           End user and super user was  
2 usually together. So for example, I would  
3 schedule like a two-hour block, and I would  
4 say, okay, the first hour is going to be your  
5 end users or your employees that are within  
6 the pilot group or the group that's going to  
7 be using the application for parallel  
8 testing. And then we would take a break so  
9 that the employees could leave the training  
10 and then the supervisors would remain for the  
11 supervisor -- or the super user, so to say,  
12 portion.

13           Q.           Okay. And what -- you mentioned  
14 parallel testing. After that is Go-Live?

15           A.           Yes, sir.

16           Q.           And did you have responsibilities  
17 during the Go-Live process?

18           A.           When you say responsibilities as  
19 far as -- because it's not really a process,  
20 so to say. It's kind of once they have two  
21 successful parallels, they're live.

22           Q.           Right. But they're not passed to  
23 support yet?

24           A.           Generally, once they Go-Live  
25 within -- I'm not sure how the project

1 manager did it, it's usually within, like,  
2 that week once they Go-Live, they start going  
3 over to support.

4 Q. Right. And I think you testified  
5 earlier that at that point, you no longer have  
6 responsibilities with respect to the client,  
7 the support team does?

8 A. That is correct. And there  
9 would be rare circumstances where maybe there  
10 was a ticket that I was working on for  
11 something. I mean, very minimal would that  
12 happen, but that would happen sometimes.

13 Q. Right. But my question is: Would  
14 it happen -- would the transition to support  
15 where you're generally not responsible for the  
16 account, for the project, would that happen  
17 before or after going live?

18 A. Right after Go-Live.

19 Q. What were your responsibilities,  
20 if any, when the client went live? Were you  
21 supposed to kind of monitor and oversee?

22 A. Just be available, if they had,  
23 like, questions or issues, especially  
24 through, like, the parallel testing too, just  
25 making sure that if there was something that



1 I needed to assist with, I was available.

2 Q. Okay. And would that be typical  
3 that you would be called on when the client  
4 went live with questions or?

5 A. More throughout the parallel  
6 testing, not really Go-Live. Because we  
7 basically tell the client, once you're over  
8 to support, you don't e-mail us anymore. Of  
9 course we say it in a nicer way, but.

10 Q. Okay. Of course. Okay.

11 Okay.

12 And I guess -- scratch that.

13 So let me, again, approximate as  
14 best we can the percentage of time that you  
15 spent on these different functions.

16 And I know it's not going to be  
17 precise and there's going to be guesstimates  
18 and I'm not, you know, trying to pin you down  
19 completely. But I want to get a sense, so we  
20 can talk later about what you're spending the  
21 majority of time doing. And you've talked  
22 about training, you've talked about initial  
23 setup, you've talked about the weekly calls,  
24 troubleshooting, obviously, you had to go over  
25 the questionnaire and the documents prior to

1 or in conjunction with the handoff.

2 I want to get a sense of what  
3 percentage of your time was spent on each of  
4 those functions or responsibilities. Did you  
5 understand?

6 A. Kind of. Can you elaborate a  
7 little bit more, I'm sorry?

8 Q. I will. So you -- while you were  
9 working as an implementation consultant, you  
10 did these things that we've discussed?

11 A. Uh-huh.

12 Q. One of the things that you did was  
13 training. What percentage of time, while you  
14 were working, were you training?

15 A. So --

16 Q. Approximately, again?

17 A. So I had multiple clients at  
18 once, and the training, essentially, the  
19 power -- or excuse me, the power user  
20 training, used to run about three hours or  
21 so.

22 Q. Right.

23 A. But because it was so rushed,  
24 they just recently changed it to do three  
25 days of three hours.

1 Q. Right. But I'm trying -- I think  
2 you're maybe a little confused about where I'm  
3 trying to -- how I'm trying to ask this.

4 I'm trying to say, you know, like,  
5 if someone asked me about my job, I would tell  
6 them, well, one of the things that I do is  
7 write briefs.

8 A. Uh-huh.

9 Q. And they might ask, well, what  
10 percentage of your job is writing briefs? I  
11 would say, well, it's probably 10 percent of  
12 the time I write briefs.

13 A. Uh-huh.

14 Q. How often are you in depositions  
15 like this? I might say that's probably 15  
16 percent of my time, and I'm not sure if I'm  
17 right. I'm just giving you an example. So I  
18 want you to translate that into your role as  
19 an implementation consultant, and I understand  
20 you don't take depositions or write briefs,  
21 but you do perform training and I understand  
22 there's a lot of different types of training,  
23 but I'm just talking about training in  
24 general. What percentage of your work time  
25 was spent training, approximately?

1           A.           Approximately, like a  
2       guesstimate, I would say maybe 30 to 40  
3       percent as far as the actual training is  
4       concerned. Now, that's not including the  
5       setup that's required prior and things of  
6       that sort.

7           Q.           Okay. How much of the -- what  
8       percentage would you give to the initial  
9       setup?

10          A.           So the initial setup or setup  
11       throughout the project? Because there's the  
12       initial setup that we do for the power user  
13       training and there's also additional setup  
14       that we do prepping for end user, super user  
15       payroll, export training?

16          Q.           How about all setup?

17          A.           So, all setup, probably 30, 40  
18       percent as well.

19          Q.           Okay. And weekly calls?

20          A.           I would have them every week and  
21       they would be either -- well, I'm sorry.  
22       Depending on the client, it would either be  
23       weekly or biweekly.

24          Q.           Okay.

25          A.           They would range anywhere from

1 30 minutes to an hour.

2 Q. Okay. So that's a smaller  
3 percentage of time?

4 A. Yes. Yes, sir.

5 Q. And troubleshooting would be a  
6 small percentage as well?

7 A. Yeah. And it would just kind of  
8 be throughout. So the troubleshooting is  
9 really hard to gauge, just because some  
10 clients were really great and I didn't need  
11 to help them as much, and then you have  
12 others like my more seasoned clients who  
13 would need a little bit more help.

14 Q. Okay. You mentioned that you were  
15 having to do multiple implementations at one  
16 time. Did I understand your testimony  
17 correctly?

18 A. Yes, sir.

19 Q. How many, typically, would you  
20 have at one time?

21 A. It ranged so often. It's hard  
22 to say. I would say at least --

23 Q. Between what and what?

24 A. Between 5 and 20. Like, it was  
25 really a big range as far as how many at

1 once.

2 Q. And I take it having that many  
3 implementations at one time would create  
4 challenges for you schedule-wise?

5 A. Yes, for sure.

6 Q. And when you look at your resume,  
7 the first bullet under your title,  
8 Responsibilities, is "Manage multiple client  
9 implementations simultaneously while meeting  
10 all project planned deadlines." Did I read  
11 that correctly?

12 A. That is correct.

13 Q. So all of these implementations  
14 would have particular deadlines?

15 A. As far as, like, checklists are  
16 concerned that the project manager put  
17 together, when like the end user, super user,  
18 was supposed to be completed, things of that  
19 sort, yes, sir.

20 Q. So you didn't set the deadlines,  
21 but you had to be aware of the deadlines?

22 A. Yes, sir.

23 Q. And you were aware of the  
24 deadlines through your review of the document  
25 that is -- is that in the checklist?

1           A.           That would be -- the checklist  
2           is actually within the project plan.

3           Q.           Project plan?

4           A.           Yes, sir.

5           Q.           Okay. So was the project plan  
6           something that you reviewed prior to the  
7           handoff to implementation consultant?

8           A.           So --

9           Q.           And I understood -- let me back  
10          up. I understood you reviewed -- I think you  
11          told me that you reviewed -- I thought I  
12          highlighted it, but the questionnaire --

13          A.           Solution design.

14          Q.           -- the solution design. Is  
15          that -- is the project plan something  
16          different from that?

17          A.           Yes, sir, it is.

18          Q.           Okay. And the project plan is  
19          something you create or the project manager  
20          created?

21          A.           The project manager creates.

22          Q.           Is that something that you review  
23          separate and apart, I take it, from the  
24          questionnaire and the solution design?

25          A.           Yeah, I use that kind of as

1 my -- I guess you could say kind of like a  
2 calendar, so to say, of when these items are  
3 due.

4 Q. Okay.

5 A. I'll use that for --

6 Q. So the project plan contains the  
7 deadlines?

8 A. Yes, sir.

9 Q. Within these checklists?

10 A. Yes, sir. And additional  
11 details about what exactly is due on the  
12 checklist, it kind of breaks it all down for  
13 them.

14 Q. And because you were dealing with  
15 multiple implementations at any one time,  
16 that's what you mean when you have to manage  
17 the client implementations simultaneously?

18 A. Right.

19 Q. And so you would have to determine  
20 your schedule from week to week based on these  
21 deadlines?

22 A. That is correct, yes, sir.

23 Q. It wasn't like every week you got  
24 a schedule saying, hey, you need to do this on  
25 a particular date, and then Wednesday you need



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1 do initial setup for this project, and on  
2 Thursday, you need to do end user training?  
3 You didn't get itemized schedules delineating  
4 your functions on a week-to-week basis?

5 A. No, I did not.

6 Q. That's a true statement?

7 A. That is a true statement.

8 MR. HERRINGTON: Sir, would you  
9 repeat that question?

10 MR. MCKEEBY: No.

11 MR. HERRINGTON: Can you read  
12 it?

13 When lawyers say, Is that a true  
14 statement, I get worried.

15 MR. MCKEEBY: Oh, no, I just  
16 thought we had a double negative there.

17 MR. HERRINGTON: Okay.

18 MR. MCKEEBY: And I'll not  
19 repeat the question, I'll ask the court  
20 reporter to read it back.

21 (Record read.)

22 MR. HERRINGTON: Okay. Thank  
23 you.

24 MR. MCKEEBY: Okay. All right.

25 MR. HERRINGTON: I thought she

1 had to say -- oh, you're not exempt -- oh,  
2 you're exempt, aren't you, yes, of course I'm  
3 exempt. You know.

4 MR. MCKEEBY: I'm not -- that's  
5 not even on my outline.

6 MR. HERRINGTON: Okay.

7 Q. (By Mr. McKeeby) Okay. All  
8 right. Let's look at the next bullet on your  
9 -- well, let me ask you about -- about the  
10 first bullet.

11 Would you agree with me that  
12 meeting the project -- you didn't set the  
13 project deadlines, but meeting the project  
14 deadlines was your responsibility?

15 A. Yes, sir.

16 Q. That's something you kept the  
17 project manager updated on in terms of where  
18 things stood vis-a-vis your functions as  
19 identified on the checklist that the project  
20 manager created?

21 A. Can you repeat that question,  
22 I'm sorry?

23 Q. I'll try to ask it differently.

24 A. Okay. Thanks.

25 Q. Would you -- would one of the

1 things you would do as an implementation  
2 consultant be to update the project manager in  
3 terms of where things stood on the deadlines?

4 A. Yes, but they were so involved,  
5 I didn't really need to send updates, too  
6 much.

7 Q. So it wasn't a discrete function?

8 A. Yes.

9 Q. Okay. They were involved, so they  
10 knew where things stood without you having to  
11 send in some type of report or something like  
12 that?

13 A. That is correct.

14 Q. Okay. Looking at that next bullet  
15 on the resume, it says "Build, lead and direct  
16 project teams to meet project objectives."  
17 Did I read that correctly?

18 A. Yes, sir.

19 Q. When you say "project teams," are  
20 you referring to internal Tyler teams or teams  
21 at the customer or both?

22 A. No, just the client, the actual  
23 client, their project team. I would make  
24 sure they clearly understood what the project  
25 manager already went over with them. I would

1 kind of reiterate, hey, these are your  
2 objectives, these are your deadlines.

3 Q. And again, the project team at the  
4 client would consist of a project manager  
5 typically?

6 A. It's usually a few people and it  
7 varies. I've been one place where they had  
8 ten people on their team, but I've been other  
9 places where it's only two. So it definitely  
10 varies.

11 Q. And how did you build the team,  
12 what does that mean?

13 A. They build -- you mean, how do  
14 they build -- like, how do they determine  
15 who's on their team?

16 Q. No. I mean, what did you mean in  
17 the resume that you provided to your current  
18 employer when you said you build a project  
19 team?

20 A. So I don't necessarily build the  
21 project team, so to say.

22 Q. What did you mean by that?

23 A. So I -- that's a great question,  
24 because I don't build the actual -- the  
25 actual teams.

1 Q. But you do lead the teams?

2 A. As far as when their due dates  
3 and things are concerned, I will reiterate  
4 that, yes.

5 Q. And the project objectives, how  
6 did you know what the project objectives were?

7 A. That was based off of the  
8 project manager. And what was within the  
9 actual project plan. So even though the  
10 project manager already goes through that  
11 with the client, it's still my job to make  
12 sure they understand they have to stay on  
13 that track.

14 Q. But you had to understand what the  
15 project objectives were?

16 A. Yes, sir, like as far as the  
17 checklists and things are concerned.

18 Q. You would determine those  
19 objectives by reviewing the solution design  
20 and the project plan?

21 A. More so the project plan.  
22 Because the solution design more so gives  
23 information of their internal policies and  
24 procedures and the project plan is what the  
25 project manager puts together, actually,

1 putting dates for their deadlines.

2 Q. The next bullet and then we will  
3 take a break, if that's okay?

4 A. Sure.

5 Q. Strong leadership and delegation  
6 skills. To whom did you delegate tasks?

7 A. To the client.

8 Q. What kinds of things would you  
9 delegate to the client?

10 A. I would do certain things like,  
11 let's say, we had the power user checklist,  
12 so it's already listed out as far as what  
13 they need to do. And I would just delegate  
14 and say, okay, these are the specific items  
15 that need to be completed by this date,  
16 pretty much like reiterating the project plan  
17 that was already put together.

18 Q. So you're delegating particular  
19 functions associated with the implementation  
20 process to someone on the project team?

21 A. Can you repeat that for me?

22 MR. MCKEEBY: Can you read that  
23 back?

24 (Record read.)

25 THE WITNESS: Yes.

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1 MR. MCKEEBY: Go off the record.

2 THE VIDEOGRAPHER: Going off the  
3 record at 11:42 a.m.

4 (A short break was taken.)

5 THE VIDEOGRAPHER: We are back on  
6 the record at 11:59 a.m.

7 Q. (By McKeeby) All right. Back on  
8 the record after a break. And I'm going  
9 through your resume. I think we're on the  
10 fourth bullet. That says you set clear  
11 expectations and goals for project teams;  
12 correct?

13 A. That is correct.

14 Q. And again, I take it the project  
15 team has the same meaning as previously used  
16 in the resume?

17 A. As the client, yes.

18 Q. And how would you set the  
19 expectations and goals, would that be in your  
20 communications with the client during your  
21 weekly calls or -- well, I'll ask it that way.  
22 Was that one of the ways that you would set  
23 the clear expectations and goals during the  
24 weekly or biweekly calls that you mentioned  
25 with the client?

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1 A. That was one of ways, yes, sir.

2 Q. What were the other ways?

3 A. We could even do an e-mail;  
4 generally speaking, I set the clear  
5 expectations and make sure they understand  
6 the goal and everything on that initial call,  
7 just kind of reiterating what the project  
8 manager set up for a timeline and for the  
9 goals.

10 Q. And the initial call is the -- the  
11 hand-off call?

12 A. Yes, sir.

13 Q. Got it.

14 And you and the project manager  
15 would be on that call?

16 A. Yes.

17 Q. Okay. Now, so I'm clear, so that  
18 the record is clear, when you were actually on  
19 site -- well, let me ask it a different way.

20 The -- you, I think, told me that  
21 between 30 to 40 percent of the  
22 implementations that you performed while you  
23 were an implementation consultant at Tyler  
24 were at the client's location.

25 A. Around about, yes, sir.



1 Q. Right. And again, I know about --  
2 that's an approximation and the record will so  
3 reflect.

4 When you were at the client's  
5 site, I take it you were doing training?

6 A. Yes, sir.

7 Q. Okay. Were there other of these  
8 functions that we've discussed that would also  
9 typically occur at the client site when you  
10 were there?

11 A. Generally, when I was on site  
12 with the client, it was for power user  
13 training, end user and super user training;  
14 those were the main reasons I would travel.

15 Q. To be at the client.

16 A. Yes.

17 Q. Okay. And there might be some  
18 troubleshooting mixed in or something like  
19 that, but that didn't necessarily have to  
20 happen at the client site, certainly?

21 A. Right. Absolutely correct.

22 Q. Okay. So typically, then, I want  
23 to re-characterize and make sure we're on the  
24 same page, if you were at the client site on  
25 these 30 to 40 percent of the times, it would

1 be to perform the training?

2 A. Most of the time, yes.

3 Q. Okay. And then the next part of  
4 the fourth bullet says, "Track project against  
5 timeline, milestones and budget and revise as  
6 needed"?

7 A. That is correct.

8 Q. What would you be revising?

9 A. So with that, if there was  
10 something within the progress -- I'll just  
11 give you an example. Let's say that they're  
12 behind schedule as far as doing the end user,  
13 super user training, so prior to the  
14 trainings, there's generally a checklist that  
15 is required prior to. So, for example, you  
16 have the power user checklist, that's  
17 supposed to be completed prior to the end  
18 user, super user. If it was not, then at  
19 that point, I would reach out to the project  
20 manager to let them know, hey, this needs to  
21 be revised, we may need to push out the date,  
22 and then they would actually update the  
23 project plan.

24 Q. Okay. So you wouldn't actually  
25 revise the -- the revise in that bullet in

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1 your resume doesn't mean changing the actual  
2 terms of a document?

3 A. No. That's not what that means  
4 there, no.

5 Q. Right. It means communicating  
6 that something needs to be changed and then  
7 the project manager would make that change?

8 A. That is correct.

9 Q. Got it. Okay.

10 I set up the question about the  
11 training and I didn't ask what I wanted to.

12 So when you're at -- when you're  
13 training at the facility -- and I understand  
14 sometimes it happened on the web training too,  
15 where you weren't at the facility?

16 A. Yes.

17 Q. But when you were at the facility  
18 doing the training that you described, you're  
19 there by yourself; correct?

20 A. Sometimes.

21 Q. Typically?

22 A. Typically, yes.

23 Q. Okay. Who else, on those  
24 occasions that are atypical, would the project  
25 manager might also be there?

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1 A. Sometimes yes, not very common.

2 Q. Okay.

3 A. Usually, they're just available  
4 if I need something.

5 Q. Right. But when you're doing the  
6 training -- it's a classroom-type training, I  
7 take it?

8 A. Yes, sir.

9 Q. And you are training either the  
10 super users, power users or end users in that  
11 classroom?

12 A. Yes, sir.

13 Q. And you're up in front of them  
14 doing the training?

15 A. Most of the time sitting down.

16 Q. Most of the time sitting down.  
17 Okay. But you're there typically by --  
18 there's no other Tyler employee there?

19 A. Yes, that is correct.

20 Q. That is correct. Okay.

21 What does the term, in that bullet  
22 point on your resume, "milestones" mean?

23 A. So milestones. There were two  
24 different things: There were milestones that  
25 had to be met as well as Go-Live checklists.

1 So milestones are essentially -- they're kind  
2 of like a checklist so to say. But that's  
3 something that, you know, I would make sure  
4 that whatever the project manager put within  
5 the project plan, I need to ensure that the  
6 client's essentially meeting those.

7 Q. But is milestones the same as a  
8 deadline?

9 A. Pretty much, yes, sir.

10 Q. Okay. And if the client wasn't  
11 meeting a milestone or deadline, you would  
12 communicate that to the project manager?

13 A. Absolutely.

14 Q. And that's the kind of thing that  
15 might result in postponing a Go-Live deadline?

16 A. That could be one of the many  
17 reasons, yes.

18 Q. Now, what is the budgeting -- what  
19 is the budget -- the "Track progress against  
20 budget" mean?

21 A. So the budget, each client can  
22 purchase different amounts of hours. So  
23 depending on how many hours they had, that  
24 would be communicated from the manager to the  
25 project manager and myself.

1 And for a short period of time,  
2 we were updating the actual -- within the  
3 project plan, there was a portion that would  
4 show the hours they had and then it would  
5 subtract the time that we were working on  
6 that. So if they got under, I believe it was  
7 10 or 12 hours, then I needed to notify the  
8 project manager so then they can speak to the  
9 client and have them purchase more hours, if  
10 necessary.

11 Q. Okay. Did you ever recommend to  
12 the client that they might need more hours?

13 A. Not unless I spoke to the  
14 project manager first, no.

15 Q. Okay. You would recommend -- you  
16 would alert the project manager to the fact  
17 that they needed more hours based on the  
18 budget?

19 A. That is correct.

20 Q. Okay. And when you're saying  
21 "hours," you're meaning training hours?

22 A. Right. Yes. Yes, sir. And  
23 those hours could also be used for some  
24 troubleshooting and setup and things of that  
25 sort as well.

1 Q. But they're hours that you're  
2 tracking as an implementation consultant?

3 A. That is correct.

4 Q. And they're hours that you  
5 actually perform services?

6 A. That is correct.

7 Q. Okay.

8 A. For the billable -- quote,  
9 unquote, billable items.

10 Q. Okay. So it was your  
11 responsibility -- or something that you did as  
12 an implementation consultant would be to  
13 review what the budget was and compare that to  
14 the amount of hours that you had billed to the  
15 project to make a determination if additional  
16 hours are needed?

17 A. So it wasn't like that. With --  
18 the project manager built a template within  
19 the project plan.

20 Q. Right.

21 A. And it started -- and I'm just  
22 going to throw out a number, it started at  
23 120 hours. So the items that were billable  
24 that I was working on, when I would type it  
25 in, it would automatically deduct from that

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1 amount based off of what the project manager  
2 set up.

3 So it would actually -- all I  
4 would do is enter in the time that I worked  
5 that was actually billable, and it would  
6 deduct it automatically, so I didn't really  
7 have to factor anything.

8 Q. Well, but you did have to track  
9 the budget; correct? Is what your resume says  
10 or?

11 A. Yes. Yes. Yes, sir, that is  
12 correct.

13 Q. Okay. Now, am I right that there  
14 are -- one of the things that you did at the  
15 initial stage of an implementation would be to  
16 review the contract; did you do that?

17 A. Yes, sir.

18 Q. Okay.

19 A. I would briefly look over the  
20 contract; I didn't go into much detail with  
21 that.

22 Q. And would you agree with me that  
23 there were different types of contract options  
24 that the client had?

25 A. Yes, sir.



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1 Q. What were those -- examples of  
2 those types of options?

3 A. So they used to do where -- I  
4 believe they stopped doing that, but where  
5 you would have a certain amount of billable  
6 hours or you could do, like, a certain amount  
7 of, like, days they used to do it. But I  
8 believe they changed that.

9 Q. Okay. Was that a paid-in-full  
10 contract?

11 A. Yes, something -- something to  
12 that extent, yes.

13 Q. So that means that they would --  
14 the client would pay an amount up front for a  
15 certain amount of billable hours?

16 A. So I'm not sure how the billing  
17 went, because I didn't handle any of that, so  
18 I can't really answer that question.

19 Q. So what's a paid-in-full contract?

20 A. So a paid-in-full contract --  
21 see you're getting into contracts, which is  
22 something I don't deal with. So when you're  
23 using these terms, I can't really answer it  
24 with confidence and say, this is exactly what  
25 that means, because I didn't deal with it. I

1 briefly looked over the contracts.

2 Q. Right. Okay.

3 So when I use the term  
4 "paid-in-full contract," is that something  
5 that you've heard before while you were an  
6 implementation consultant or is that a phrase  
7 that you're not familiar with?

8 A. Don't quote me on this, once  
9 again, because I don't -- and I know that's  
10 horrible to say while I'm sitting here, but I  
11 don't deal intimately with the contracts at  
12 all.

13 Q. Right. But you did review them as  
14 part of the process?

15 A. Briefly review, yeah.

16 Q. But you didn't really care as much  
17 what type of contract they were?

18 A. No, that wasn't something that I  
19 was really too focused on, because everything  
20 is within the actual project plan, so I could  
21 look there and determine --

22 Q. Right.

23 A. -- how I would handle the  
24 client.

25 Q. Are you aware that there's certain

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1 contracts that provided for a fixed price?

2 A. I believe there is. But I'm not  
3 confident in saying yes.

4 Q. Okay. Who would I ask about the  
5 different types of contracts?

6 A. Probably, like, the sales  
7 department, because they handle contracts and  
8 things of that sort.

9 Q. You weren't an expert on that?

10 A. Not on the sales, no, sir.

11 Q. I mean, because it didn't matter  
12 in terms of the implementation consultant  
13 duties that you were performing whether they  
14 paid up front or whether they were being  
15 billed by the hour; correct?

16 A. They still have to get the work  
17 done, either way they purchase the contract.

18 Q. So is that a yes to my question?

19 A. Can you repeat that question for  
20 me?

21 MR. MCKEEBY: Can you read it  
22 back?

23 (Record read.)

24 Q. (By Mr. McKeeby) Do you understand  
25 it or do you need another question?

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1 A. Can you do another question, if  
2 you don't mind?

3 Q. Well, let me do another question.

4 A. Thank you.

5 Q. Okay. In terms of your duties, it  
6 didn't matter whether the contract was a fixed  
7 fee or whether it might vary depending on the  
8 hours billed, did it?

9 A. What you're saying is correct.  
10 I would still have to do the same duties  
11 regardless of how the contract was.

12 Q. Okay. So the next meeting -- the  
13 next bullet in your resume says, "Hold  
14 regularly scheduled meetings with the client  
15 to ensure that milestones are met." Did I  
16 read that correctly?

17 A. That is correct.

18 Q. Does that refer to the weekly or  
19 biweekly phone calls that you mentioned?

20 A. That is correct.

21 Q. So by "meetings" there, you're not  
22 taking about a face-to-face meetings  
23 necessarily?

24 A. No. I'm referring to, like, my  
25 weekly calls that I would do.

1 Q. Okay. And would those be just  
2 between you and the client contact person?

3 A. Sometimes the entire team would  
4 attend. If needed, sometimes the project  
5 manager would attend. But generally  
6 speaking, it was usually me and the project  
7 manager or whoever is running the project on  
8 the client side.

9 Q. Got it.

10 And would those calls be -- how  
11 would you schedule those calls?

12 A. So it's actually determined by  
13 the project manager from the beginning. And  
14 I can't remember if it's the solution design  
15 or the questionnaire, but in one of those  
16 documents they generally determine do they  
17 want weekly or biweekly calls and do they  
18 want 30-minute calls or hour calls.

19 Q. Okay. But in terms of when they  
20 occur during -- let's say it's a weekly  
21 call --

22 A. Uh-huh.

23 Q. -- when in the week they occur, is  
24 that something that you schedule with the  
25 client?

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1 A. I would, yes, sir.

2 Q. And is that -- would there be sort  
3 of an agenda or schedule that you would create  
4 that would contain various functions including  
5 the meeting or the call?

6 A. No, not necessarily, no.

7 Q. You would just reach out to the  
8 client and say, we need to have our weekly  
9 call, what's your schedule look like?  
10 Something along those lines?

11 A. No. I'm sorry, maybe I  
12 misunderstood your question. They were set  
13 for a certain day and certain time, either  
14 weekly or biweekly.

15 Q. Right.

16 A. I set that up.

17 Q. Okay. How did you go about  
18 setting that up? Communicating with the  
19 client about what was best on their schedule?

20 A. Yes, sir.

21 Q. Okay. So that was just kind of  
22 a -- would be a weekly reminder then that you  
23 were scheduled to have that call at that time?

24 A. Absolutely. We would literally  
25 just log onto the call and meet. So if we

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1 had it scheduled Wednesdays at two o'clock, I  
2 would send out a reoccurring GoToMeeting and  
3 then we would log in.

4 Q. Got it. Okay. And that would, I  
5 guess, relate to the first point in your  
6 resume about managing multiple client  
7 implementations simultaneously, you would --  
8 might have multiple of those calls every week,  
9 I take it?

10 A. Oh, yes, that is correct.

11 Q. Okay. And the next bullet  
12 references providing "software application  
13 training using a variety of delivery methods  
14 including web-based and on-site training."  
15 Did I read that correctly?

16 A. Yes, you did.

17 Q. That's the various types of  
18 training that we've mentioned and at some  
19 level discussed, the power user, end user and  
20 super user training, that's what you're  
21 referring to; correct?

22 A. Yes, sir.

23 Q. Okay. And the next bullet says,  
24 "Coordinate new customer implementations  
25 providing effective training to maximize the

1 use of software."

2 Is that something distinct from  
3 these other bullets?

4 A. What do you mean is that  
5 something distinct from the other bullets?

6 Q. What did you mean by "Coordinate  
7 new customer implementations"?

8 A. So with that, basically,  
9 coordinating their effective training,  
10 coordinating when the training would occur  
11 based off of the project manager, just making  
12 sure that they understood the software and  
13 kind of getting everything, you know,  
14 coordinated for the client.

15 Q. Right. But aren't all of the  
16 customers new customers?

17 A. Yes.

18 Q. Okay. And so you would agree with  
19 me then, based on this bullet, that the  
20 effectiveness of your training at least played  
21 a role in whether or not the client was able  
22 to maximize the use of the software?

23 A. Can you repeat that for me,  
24 please?

25 Q. Your resume says that one of the



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1 things you did was "Provide effective training  
2 to maximize the use of the software"?

3 A. Yes, sir.

4 Q. So is it a true statement then  
5 that the effectiveness of your training  
6 affected whether or not the customer, client  
7 was able to maximize their use of the  
8 software?

9 A. Not necessarily, because it  
10 depends on if they're -- for example, like my  
11 seasoned client where my training was still  
12 the same as I do with every other client,  
13 they were just having a harder time  
14 understanding.

15 Q. Right. So I understand that  
16 effective training might not always lead to  
17 maximization of the use of the software.  
18 Right?

19 A. Yes.

20 Q. But if you provided ineffective  
21 training, you wouldn't expect that the  
22 maximization of the use of the software to  
23 occur; correct?

24 A. Correct.

25 Q. And then the last two bullets are

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1 just kind of general descriptions of things  
2 that you needed to do your job well at Tyler,  
3 excellent communications and effectiveness at  
4 engaging with people from all backgrounds?

5 A. Yes, sir.

6 Q. Why did you decide to not return  
7 to Tyler after your FMLA leave of absence?

8 A. I had every intention to, but  
9 the amount of stress and -- that was just  
10 going on within Tyler, I just decided to  
11 start looking for another job.

12 Q. What stress do you mean?

13 A. Well, there were several  
14 situations where -- and I also reported that  
15 to HR, with the hostile work environment with  
16 the one gentleman.

17 Q. That you mentioned before?

18 A. Yes. And there was a few  
19 situations with that. There was my manager  
20 did not like me; so she was not very nice to  
21 me at all. There were --

22 Q. Which manager do you mean?

23 A. Hillary. There were a few  
24 situations there.

25 Q. Is she the person to whom you

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1 reported at the end of your employment with  
2 Tyler?

3 A. Uh-huh.

4 Q. Is that yes?

5 A. Yes, that is correct.

6 Q. You would agree with me that you  
7 didn't -- well, I'm sorry. What was her job  
8 title?

9 A. I believe her actual title was  
10 the implementation manager.

11 Q. And the project managers that you  
12 worked for, you understood they also reported  
13 to Ms. Pasch?

14 A. That is correct.

15 Q. Any other reason you didn't go  
16 back to Tyler?

17 A. Not that I can think of off the  
18 top of my head, no.

19 Q. Let me talk a little bit about the  
20 training that you provided as an  
21 implementation consultant. We addressed some  
22 of it. You described it as classroom training  
23 where you would either be standing or  
24 sitting -- maybe more sitting than standing --  
25 with a group of people depending on whether or

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1 not you were training power users, end users  
2 or super users; correct?

3 A. Yes, sir.

4 Q. And would -- you would be training  
5 them on how to use the time and attendance  
6 software; correct?

7 A. Yes, sir.

8 Q. Okay. And you would do that by  
9 pulling up -- you would have a screen?

10 A. Yes.

11 Q. Okay. And what would be on the  
12 screen? Their system; correct?

13 A. It would be their -- the  
14 ExecuTime application with their setup within  
15 the application. So their employees, so  
16 essentially would be their information.

17 Q. And that was -- that information  
18 was in the ExecuTime application as a result  
19 of the initial setup work that you had done;  
20 correct?

21 A. Some of it was from the initial  
22 setup. Some of it was integrated and put in  
23 through the project manager and our tech  
24 team.

25 Q. Okay. But in terms of the

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1 training, you had on a screen the software  
2 with the client information?

3 A. That is correct.

4 Q. Okay. It wasn't like a PowerPoint  
5 that you had prepared prior to the training  
6 session; correct?

7 A. No, sir, that is correct.

8 Q. And so the -- the client  
9 information being used in the executive -- I'm  
10 sorry, ExecuTime application, would -- that  
11 would vary from client to client; correct?

12 A. That is correct.

13 Q. And how did you conduct the  
14 training? Did you just kind of walk through  
15 different aspects of the software to show  
16 different functionalities?

17 A. Yes, sir.

18 Q. Did you ask questions of the  
19 attendees?

20 A. Within the power user training,  
21 yes. The end user and super user, no. I  
22 would allow them to ask questions at the end,  
23 once the training was completed, but I  
24 didn't, like, ask them questions throughout  
25 the training.

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1 Q. But you did that when you were  
2 training the power users?

3 A. Power users, yes.

4 Q. And why is that?

5 A. Because I needed to confirm and  
6 make sure that the information that I have in  
7 regards to how they run their actual  
8 department or, you know, the city, however  
9 they run it, I need to make sure that it's  
10 put within the application correct.

11 Q. Did you ever have instances where  
12 you would let the -- one of the power users  
13 actually kind of take over the operation of  
14 the system that was on the screen and  
15 manipulate that during the training?

16 A. Well, that's usually the first  
17 time they've really seen it. So in that  
18 class, generally no.

19 Q. Okay.

20 A. But the weeks after when we had,  
21 like, the weekly calls after the power user  
22 training, at that point, they have been in  
23 the application and doing things then.

24 Q. Okay. So then you might be more  
25 inclined to let them take over and run the

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1 software, so to speak?

2 A. They wouldn't really run it, so  
3 to say, but absolutely, we encouraged them to  
4 get into the application and start doing  
5 different things in there and using it.

6 Q. And that was part of the power  
7 user training?

8 A. Well, it's usually done after  
9 the power user training when they get in the  
10 application, because essentially the power  
11 user training, they're really watching me  
12 show them where everything's located.

13 Q. How long would the -- would the  
14 power user training typically occur, in one  
15 session or multiple sessions?

16 A. So the power user training, we  
17 actually struggled with that, that's why they  
18 made internal changes within Tyler for that,  
19 because it was only three, to three and a  
20 half hours, and the clients were having a  
21 really hard time because it was too much  
22 information crammed in. So now they do  
23 three, three-hour classes on three different  
24 days. Because when you travel on site,  
25 you're always on site for at least three full

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1 days. But if it's remote, it's three and a  
2 half hours, so it's just very, very crammed.

3 Q. Okay. So if you're on site, you  
4 would do it in -- on three separate days, each  
5 three-hour training session?

6 A. No, I would be in there eight  
7 hours.

8 Q. Right. But the power user  
9 training would be?

10 A. Eight hours for three full days;  
11 I would go and I would go into it in more  
12 detail. And I think that's why we were  
13 having complaints, is because three and a  
14 half hours is not enough time to go through  
15 it remote.

16 Q. When did this change occur in  
17 terms of how these were scheduled?

18 A. They were just starting to do  
19 that, like, right before I left.

20 Q. Okay. So the majority of the time  
21 when you were doing on-site training while you  
22 were an implementation consultant, you would  
23 do it for -- in multiple sessions or in the  
24 single session, power user training?

25 A. It would be 8:00 to 5:00, you've



1 blocked off your calendar and I get you for  
2 the entire day. We sit in a room and we're  
3 in the computer except for minus lunch and  
4 breaks.

5 Q. And when you say, "We're in the  
6 computer," you mean you and the power users?

7 A. That is correct.

8 Q. Which are typically more than one  
9 person?

10 A. Typically, yes.

11 Q. And that would be for three full  
12 days?

13 A. Yes.

14 Q. So I'm confused. You said that  
15 something changed where the power user  
16 training was done differently with respect to  
17 time towards the end of your employment?

18 A. The remote power user training.

19 Q. Okay. So the on-site power user  
20 training was always done 8:00 to 5:00, three  
21 consecutive days?

22 A. Generally speaking, yes.

23 Q. Okay. But the remote training  
24 changed from three, to three and a half hours  
25 to three hour sessions on three consecutive

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1 days?

2 A. Different days.

3 Q. Three different dates? Okay.

4 A. Yes. Usually like a week in  
5 between, so it would be three hours this  
6 week, three hours next --

7 Q. Yeah. Okay. So instead of 3 to  
8 3.5 hours, it was nine hours?

9 A. That is correct.

10 Q. Okay. Was that for every client  
11 or did it depend on the particular client  
12 contract?

13 A. They were starting to do that  
14 for every client.

15 Q. Okay. And your understanding of  
16 the reason for that was that it just wasn't  
17 enough time, the three to three and a half  
18 hours wasn't enough time to train the power  
19 users remotely?

20 A. Absolutely. Yeah, a lot of the  
21 clients were starting to complain and they  
22 were having a hard time grasping it with such  
23 a short amount of time.

24 Q. The clients would complain to you?

25 A. Yes. And even management, they

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1 started reaching out just saying, it's just  
2 not enough time to do the power user.

3 Q. Did you communicate those  
4 complaints to Ms. Pasch?

5 A. Yes.

6 Q. And did you agree with the  
7 substance of the complaints, that the three to  
8 three and a half hours wasn't enough time for  
9 them to be trained on the software?

10 A. Yes.

11 Q. And did you communicate that to  
12 Ms. Pasch?

13 A. Yes. And there were others that  
14 did as well. I think that's why they went  
15 ahead and changed it, because you could see  
16 it was clearly challenging for our client to  
17 grasp that much information in three and a  
18 half hours.

19 Q. When you say others, you think  
20 there were other implementation consultants  
21 that may have had the same issues that you  
22 did?

23 A. Yes.

24 Q. Why do you say that? Did you talk  
25 to other implementation consultants?

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1 A. Yes.

2 Q. So since we're talking about other  
3 implementation consultants, did you ever talk  
4 to other implementation consultants about the  
5 reasons for your lawsuit in this case in terms  
6 of overtime compensation?

7 A. No.

8 Q. Have you ever talked to any  
9 lawyers other than Mr. Herrington or the other  
10 members of his firm about this case?

11 A. I have not. I received a letter  
12 from another one, but I did not contact them.

13 Q. Was the letter from someone in  
14 Baltimore?

15 A. I don't recall exactly where it  
16 was. But it was for, like, a class action.  
17 But I didn't -- I didn't reach out to them.

18 Q. Was -- did you receive the letter  
19 before or after you filed this lawsuit?

20 A. It was after.

21 Q. Do you still have the letter?

22 A. Honestly, I don't know. I don't  
23 think I do, but I may.

24 Q. Okay. Have you talked to any  
25 other Tyler employees about receiving a

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1 similar letter?

2 A. No.

3 Q. Have you ever talked to other  
4 Tyler employees about the letter that you  
5 received?

6 A. No.

7 Q. Let me talk to you a little bit  
8 about the troubleshooting work that you did.  
9 I think to use your term that kind of -- well,  
10 not your term, but your testimony -- that  
11 throughout the process, and this would vary,  
12 you would do certain levels of  
13 troubleshooting?

14 A. Yes, sir.

15 Q. What type of troubleshooting would  
16 you do?

17 A. So an example would be the  
18 client is within the application and overtime  
19 is not populating. Or the client's in the  
20 application and they can't convert their  
21 overtime to comp time. Excuse me. Those  
22 would be a few examples --

23 Q. So what was the second one, I'm  
24 sorry, can't convert?

25 A. Overtime to comp time.

1 Q. Okay. And how would you become  
2 aware that these problems were occurring? The  
3 client would advise you or were you able to  
4 see this during training or through some other  
5 way?

6 A. They would communicate that with  
7 me.

8 Q. Okay. They might communicate that  
9 to you during a weekly call, for example?

10 A. Absolutely, yes.

11 Q. Can you think of an example where  
12 an issue like this was communicated to you by  
13 a particular client?

14 A. I mean, Turlock, California, is  
15 a good example, because they used to run into  
16 different issues. One they had even -- was a  
17 visual issue within the application. So  
18 those types of troubleshooting would not be  
19 billable, but of course, we would still have  
20 to complete the troubleshooting.

21 Q. How did you know what was billable  
22 and what wasn't? Or did you make that  
23 determination?

24 A. Well, we would make the  
25 determination based off of the list that our

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1 implementation manager had sent out as far as  
2 what's billable and what is not.

3 Q. And troubleshooting wasn't on the  
4 list?

5 A. Well, certain troubleshooting  
6 is, yes. But if it had something to do with  
7 a defect, then no. You would basically  
8 troubleshoot and not bill the time.

9 Q. Okay. And so what troubleshooting  
10 would not involve a defect?

11 A. Overtime not populating, that's  
12 not a defect, that's just either the correct  
13 employee is not attached to the correct  
14 policy, that could be something as simple as  
15 under the preferences in the back end. But  
16 that's not necessarily a quote, unquote,  
17 defect.

18 Q. So when -- a situation when  
19 overtime wasn't populating in the software,  
20 would that be something you could address and  
21 fix yourself or would you have to escalate  
22 that?

23 A. Generally, that type of  
24 troubleshooting, I would be able to fix,  
25 because it's not very technical. It's just

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1 basically trying to copy the error that  
2 they're receiving.

3 Q. Were there types of errors that  
4 you trouble shot and then determined that you  
5 could not fix?

6 A. Absolutely.

7 Q. And those you would escalate to  
8 the...

9 A. First the project manager and  
10 then it would go to our tech team, which we  
11 would submit a ticket for them.

12 Q. Who would prepare the ticket?

13 A. I would.

14 Q. And when you say the "tech team,"  
15 is that a group that sits in Little Rock or  
16 was it a group that sits in Little Rock?

17 A. Not all of them are in Little  
18 Rock, because we have probably more remote  
19 employees than we do in office, but some of  
20 them are in Little Rock, yes.

21 Q. Would there be a specific tech  
22 person to whom you would submit the ticket?

23 A. No, it's whoever is available.  
24 It would go to a queue and I'm not sure how  
25 they distributed it on their side.



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1 Q. And then were you responsible to  
2 keep in contact with the tech person to ensure  
3 that the problem was addressed?

4 A. Well, essentially, they would  
5 send me an e-mail once they have it and  
6 they're working on it.

7 Q. You mentioned Turlock, California.  
8 That was an implementation that you handled on  
9 site?

10 A. Yes, sir. The power user  
11 training -- I did -- I actually went back out  
12 for the end user, super user as well.

13 Q. So you were out there on two  
14 occasions?

15 A. Yes.

16 Q. Once for power user training and  
17 once for end user, super user training?

18 A. That is correct.

19 Q. I'm going to mark two exhibits, 3,  
20 and 4.

21 (Whereupon, Exhibit 3 was marked  
22 for identification.)

23 (Whereupon, Exhibit 4 was marked  
24 for identification.)

25 Q. (By Mr. McKeeby) And just to keep

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1 us all on our toes, I'm going ask you about 4  
2 first.

3 A. Okay.

4 Q. That is 3. I may not have another  
5 copy of 4.

6 Did I give you two documents?

7 A. I have two, yes, sir. I have an  
8 extra one, sorry.

9 Q. Give that one to your counsel,  
10 please.

11 MR. HERRINGTON: Wait. Which one  
12 is which?

13 THE WITNESS: This is the first  
14 one we're going over.

15 MR. MCKEEBY: That's 4, actually.

16 MR. HERRINGTON: This is 4.

17 Q. (By Mr. McKeeby) That was a user  
18 error in terms of the numbering. So I guess  
19 let's talk about both of the documents at a  
20 general level. These both deal with the  
21 Turlock, California implementation that we  
22 were just discussing; correct?

23 A. Yes, sir.

24 Q. And your project manager on that  
25 was Mikeya Henderson?

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1 A. That is correct.

2 Q. Okay. And in Exhibit 4, on the  
3 second page, is -- starts some e-mail  
4 communications between you and Ms. Henderson?

5 A. That is correct.

6 Q. There's an e-mail from you dated  
7 May 16th, 2018, where you're saying, "Attached  
8 is my on-site agenda for Turlock"?

9 A. That is correct.

10 Q. Okay. And is Exhibit 3 the  
11 on-site agenda that you created?

12 A. Give me one moment to look  
13 through this.

14 Q. Yeah, take your time.

15 A. So this looks accurate. I did  
16 not create the actual agenda itself, but I  
17 did update the times and things of that sort.  
18 I believe this is a template that Mikeya  
19 initially set up, so I would go into a  
20 template and update what we would do.

21 Q. And by that, you mean you would  
22 put the times in?

23 A. That is correct. And what we're  
24 doing within those times.

25 Q. And that would be the product of

1 your communications with the client? How did  
2 you know to put, for example, 10:15, system  
3 admin training, master file management?

4 A. So the template that she  
5 actually had set up is -- the times are  
6 already on there. So if modifications needed  
7 to be made, then I would do that. But  
8 essentially, I would go through the initial  
9 template that was sent, usually not making  
10 many modifications at all, send it to the  
11 client, so that if modifications needed to be  
12 made, so if the 9:00 to 10:00 training admin  
13 overview didn't work for them, then I would  
14 be able to adjust that.

15 Q. Right. But in the e-mail when you  
16 say, "Attached is my on-site agenda," you had  
17 done something to the template; correct?

18 A. I believe this was when we  
19 started doing workshops, which was something  
20 we were trying out that was a little bit  
21 different.

22 Q. What's a workshop?

23 A. A workshop is -- it's just  
24 basically the way we worded it to say, okay,  
25 for this specific time -- instead of just an

1 admin overview, we're going to spend these  
2 three hours on pay codes, as you can see on  
3 the first day, Tuesday. And then the next  
4 day, the workshop, you can see it's overtime  
5 and comp time for several hours. So it's  
6 just basically breaking it down in more depth  
7 in regards to the training we're doing.

8 Q. Okay. But I don't think you  
9 answered my question. When you say -- when  
10 you send her this on-site agenda, I think you  
11 said that you had modified the template to  
12 tailor it to this particular implementation;  
13 is that correct?

14 A. That's -- to an extent, that's  
15 correct.

16 Q. Okay. What did you do to the  
17 template?

18 A. So this --

19 Q. What was your -- what was your  
20 role in this document?

21 A. So if I'm not mistaken, I  
22 believe this is one of the first times we did  
23 the workshop, so I added the workshops in  
24 there.

25 Q. Okay. Okay. And did you discuss

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1 this schedule with the client?

2 A. Yes, this is sent over to the  
3 client as well.

4 Q. And does the client approve the  
5 agenda?

6 A. They'll -- generally, they'll  
7 say if any modifications need to be made.  
8 But if not, it's usually, here's the agenda.  
9 So it's not necessarily an approval, quote,  
10 unquote, so to say.

11 Q. I'm going to mark this document as  
12 Exhibit 5.

13 (Whereupon, Exhibit 5 was marked  
14 for identification.)

15 Q. (By Mr. McKeeby) The document says  
16 it's a position description for implementation  
17 consultant? Do you agree?

18 A. The job title does say  
19 implementation consultant, yes.

20 Q. Have you seen this document before  
21 I handed it to you?

22 A. One moment so I can look through  
23 this.

24 Q. Sure. Take your time.

25 A. I believe so, yes.

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1 Q. When did you see it?

2 A. I'm not sure of the date.

3 Q. While you were employed with  
4 Tyler?

5 A. I believe so, yes. It was a  
6 document -- I can't say if it's this exact  
7 document, but it was similar.

8 Q. You saw a job description at some  
9 point?

10 A. At some point, yes, sir.

11 Q. Did the job description you saw --  
12 was it consistent with the duties you were  
13 performing as an implementation consultant?

14 MR. HERRINGTON: I'm sorry, are  
15 you asking about this document or a document  
16 that she believes she saw in the past?

17 MR. MCKEEBY: The latter.

18 Q. (By Mr. McKeeby) You testified  
19 that at some point you -- during your  
20 employment with Tyler, you didn't know when,  
21 you saw a job description and that it might be  
22 this document but you're not sure; right?

23 A. That is correct.

24 Q. When you saw the document while  
25 you were employed with Tyler, did you read it?

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1           A.           Briefly looked over it, I didn't  
2 read it in full detail.

3           Q.           Did it appear, based on your  
4 review, to be consistent with the job that you  
5 had as an implementation consultant?

6           A.           For the most part. The  
7 overview -- I would say for the most part,  
8 yes.

9           Q.           Okay. And is this document, for  
10 the most part, consistent with what you did as  
11 an implementation consultant in terms of the  
12 principal duties? And take your time to read  
13 it.

14          A.           Yeah, give me just a moment, if  
15 you don't mind, please.

16          Q.           Yeah.

17                       MR. MCKEEBY: And after you're  
18 done with that and this line of questioning,  
19 we'll take our lunch break.

20                       (A short discussion was held.)

21                       THE WITNESS: So the second bullet  
22 says to create a new model to use in the  
23 deployment of the project, I didn't do  
24 anything as far as creating models are  
25 concerned.



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1 Q. (By Mr. McKeeby) Okay.

2 A. "Consult with users to identify  
3 the proper data mapping" product -- excuse  
4 me, "process for the product conversion," I  
5 didn't do anything with data mapping.

6 "Provide instruction on proofing  
7 and analyzing data conversion from existing  
8 software to Tyler applications," I did not do  
9 that.

10 Q. Okay.

11 A. Train, of course I did that  
12 part. Plan out the role and troubleshooting,  
13 yes.

14 I'm not sure what that means by  
15 "Create a custom report," because we didn't  
16 offer custom reports, we had very standard,  
17 generic reports within the application, so  
18 I'm not sure what that means.

19 Q. So you would disagree with the  
20 notion that you created custom reports?

21 A. Yeah, because that's -- that's  
22 vague and I'm not really too sure what they  
23 mean by that.

24 Q. Okay.

25 A. Arrange travel. (Reading

1 document.)

2 Assist the QA staff with product  
3 testing or modification testing as required,  
4 that's a little vague, I'm not absolutely  
5 sure what they're saying there.

6 Q. Okay. But you did -- the three  
7 bullets before that you're okay with, arrange  
8 travel upon receipt, keep up to date on  
9 administrative tasks and design and conduct  
10 training sessions?

11 A. Yes.

12 Q. Okay. What about the last two?

13 A. So the last one, "Create both  
14 client facing and internal documentation,  
15 such as quick tips, how tos," all of that is  
16 templates that we may modify a little bit,  
17 but I didn't necessarily create those  
18 templates.

19 And the last one is pretty  
20 accurate, because everything is self-study,  
21 because there isn't, like, training or  
22 anything, you kind of have to train yourself.

23 Q. Okay.

24 A. Should I read the next box as  
25 well?

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1 Q. What box do you mean?

2 A. Should I keep going?

3 Q. No.

4 A. Okay.

5 Q. You may do that at your  
6 convenience.

7 A. Okay.

8 MR. MCKEEBY: Let's take a break.

9 THE VIDEOGRAPHER: Going off the  
10 record at 12:48.

11 (A short break was taken.)

12 THE VIDEOGRAPHER: We are back on  
13 the record at 1:47.

14 Q. (By Mr. McKeeby) Back on the  
15 record after a lunch break. I don't think I  
16 asked you exactly this question.

17 When you were an implementation  
18 consultant, how would you know when you were  
19 assigned to a particular implementation?

20 A. The implementation manager would  
21 let us know and the project manager would  
22 give me the cue when it was time for me to  
23 step in as well.

24 Q. Okay. So you would get some type  
25 of communication from the implementation

1 manager that you were assigned to a new  
2 implementation?

3 A. Yes. But keep in mind, the  
4 first part of the implementation, I didn't  
5 work on. So then that's why it was necessary  
6 for a second step, for the project manager to  
7 say, okay, I'm done with my stuff, go ahead.

8 Q. And that would trigger the  
9 handoff?

10 A. Yes, sir.

11 Q. Okay. But you would know about  
12 the fact that you were on the particular  
13 project well before the handoff, based on the  
14 notice that you would receive from the  
15 implementation manager?

16 A. That is correct.

17 Q. And would that notice come in the  
18 form of just an e-mail?

19 A. E-mail or a phone call. Either  
20 one.

21 Q. Would you receive any documents at  
22 that point or just a notification of the  
23 assignment?

24 A. Generally, at that point, just,  
25 hey, this has been assigned to you guys.

1 Q. So you wouldn't get the contract  
2 at that point to review?

3 A. No, generally, we would have to  
4 go look up that information. We had, like, a  
5 shared drive where a lot of documents would  
6 be held at.

7 Q. Okay. So the notification from  
8 the implementation manager of the assignment  
9 would trigger your responsibility to look up  
10 the documents?

11 A. Yes, sir.

12 Q. And by the documents, at that  
13 point, we're talking about the contract with  
14 the client?

15 A. The solution design -- or well,  
16 excuse me, I'm sorry, solution design hasn't  
17 quite been there yet. Once it was my turn to  
18 take the project, that's when I would look up  
19 the documents; I didn't generally go in and  
20 look up the documents when it was assigned to  
21 the project manager.

22 Q. What documents could you have  
23 looked up when it was assigned to the project  
24 manager? You could look at the contract?

25 A. Just the contract at that point,

1 really.

2 Q. Okay. But at that point, it  
3 wasn't necessary for you to review the  
4 contract, because you wouldn't be handed off  
5 the project until several weeks, at least,  
6 later?

7 A. Absolutely, until the solution  
8 design and the questionnaire because that has  
9 more information that I would actually need.

10 Q. But you would review the contract  
11 as part of that pre-handoff process; correct?

12 A. I would briefly -- briefly, look  
13 at the contract. I would not go through that  
14 contract like I did the questionnaire,  
15 solution side.

16 Q. Was there any particular provision  
17 of the contract with the client that you  
18 wanted to look at?

19 A. Not that I can think of off the  
20 top of my head, no.

21 Q. Were you at a meeting in 2018 in  
22 November in Little Rock where implementation  
23 consultants were advised by Ms. Pasch that  
24 there would be a change to how you recorded  
25 time?

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1 A. Yes.

2 Q. Okay. Was that an implementation  
3 consultant meeting, if I described it that  
4 way, is that --

5 A. No.

6 Q. How you would describe it?

7 A. It was an overall meeting,  
8 project managers and implementation  
9 consultants, it was a change for everyone.

10 Q. Okay. Was the meeting at the  
11 Tyler offices in Little Rock?

12 A. So, no, it was not. They  
13 actually reserved a room. There was, like, a  
14 golf course and stuff outside of the room,  
15 but the office in Little Rock wasn't big  
16 enough to hold everybody.

17 Q. So was the meeting, like, in a  
18 hotel or?

19 A. It wasn't a hotel. I couldn't  
20 tell you exactly where it was.

21 Q. Just a conference room?

22 A. Yes, sir.

23 Q. And Ms. Pasch presided over the  
24 meeting, I take it?

25 A. Her as well as Jamie.

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1 Q. Jamie Burns?

2 A. Yes, Jamie Burns, uh-huh.

3 Q. Was it a multiple-day meeting?

4 A. Yes.

5 Q. Was this an annual meeting or  
6 just --

7 A. Yes, sir.

8 Q. Okay. And you indicated  
9 affirmatively when I asked if there was a  
10 disclosure of a change in time recordation by  
11 implementation consultants, and I guess  
12 project managers as well; right?

13 A. Can you repeat that for me? I'm  
14 sorry.

15 Q. No. I can try to restate it.

16 A. Okay.

17 Q. I don't think it was a very good  
18 question.

19 My understanding was at this  
20 meeting you were told that there was going to  
21 be a change in the way you recorded your time?

22 A. That is correct.

23 Q. That change would apply both to  
24 implementation consultants and to project  
25 managers?



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1 A. That is correct.

2 Q. Okay. And am I also correct that  
3 you were told that you would no longer have to  
4 record all of your time, that from then on,  
5 you would only have to record billable time?

6 A. We were only recording billable  
7 time from that point, which you are correct.  
8 Even previously, we weren't really recording  
9 all of the time.

10 So things that weren't billable  
11 like admin items that you were working on,  
12 not every single item that you worked on was  
13 tracked, so to say.

14 Q. Okay. So then I guess I'm  
15 confused.

16 A. Yes, sir.

17 Q. What was going to be different  
18 going forward as of November 2018?

19 A. So prior to November 2018, our  
20 timesheet had to at least equal up to 40  
21 hours. So you didn't have to go into great  
22 detail of what you did with admin, but you at  
23 least had to put the hours there where it  
24 equaled to 40 hours for that week.

25 After November 2018 -- and I

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1 believe we only tracked our time for about  
2 six months or so, but after that, there was  
3 no admin time required at all. They didn't  
4 care if it said 40 hours, they just wanted  
5 what was billable and that was it.

6 Q. Oh, okay. You said you believed  
7 you only tracked your time for six months or  
8 so?

9 A. About, that's a guesstimate, of  
10 course.

11 Q. Okay. I understand, the  
12 approximate time.

13 A. Yes.

14 Q. But so -- I don't understand what  
15 you're saying. So there was a -- six months  
16 prior to this meeting in November, you tracked  
17 your time but not before that?

18 A. Huh-uh, we did not track time  
19 prior to that.

20 Q. Okay. So -- so around May of 2018  
21 is when you first started tracking time?

22 A. Around -- around about.  
23 Possibly a little bit before then, but --

24 Q. In that range?

25 A. Yes, sir.

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1 Q. So for 2017, for example, you did  
2 not record your time?

3 A. No, sir.

4 Q. Okay. Then at some point, I take  
5 it in 2018, you were instructed that you  
6 needed to start recording your time?

7 A. At least have 40 hours on  
8 that -- on the timesheet.

9 Q. But before that you didn't even  
10 record your time?

11 A. No, sir.

12 Q. Is that true?

13 A. That is correct.

14 Q. Okay. So what -- when you started  
15 recording your time around May of 2018, how  
16 did you do that? Was there a database you  
17 would go into or a program?

18 A. Yes, sir. We had a tracker that  
19 we would just --

20 Q. Time tracker?

21 A. Yes, sir.

22 Q. So the time tracker was introduced  
23 in May of 2018?

24 A. Around that time, yes, sir.

25 Q. Around that time?

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1 A. Yeah.

2 Q. Sorry. Sorry.

3 And did you receive instruction as  
4 to what you were supposed to do to record your  
5 time?

6 A. Yes, sir.

7 Q. And in what form was that  
8 instruction?

9 A. The biggest thing was just  
10 tracking the billable hours. They weren't as  
11 concerned with things that weren't billable,  
12 like troubleshooting, like documents, like  
13 doing other things of that nature. They  
14 weren't as concerned; they just wanted to  
15 make sure that the billable time was listed  
16 and our timesheet at least equalled to 40  
17 hours.

18 Q. Okay. But my question was, how  
19 did you receive that instruction? Was it in a  
20 memo, was there a policy that was put out or  
21 was it training that you were given? How were  
22 you told these things?

23 A. I cannot recall if it was either  
24 a phone call meeting -- like on a GoToMeeting  
25 or an e-mail, I'm not sure which one it was.

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1 Q. Okay. So prior to this time,  
2 there was no time tracker, obviously; right?

3 A. That is correct.

4 Q. So did you bill time prior to this  
5 time?

6 A. Sometimes we did. But keep in  
7 mind, we didn't always bill for our time with  
8 ExecuTime.

9 Q. What would that depend on?

10 A. Once they started having us  
11 bill. So it was something, once we were  
12 acquired by Tyler -- I can't remember the  
13 exact date, but they said, we're going to  
14 start billing for items.

15 Q. So prior to the Tyler acquisition,  
16 you did not bill your time?

17 A. We did not, no.

18 Q. Okay. And did you bill your time  
19 prior to this institution of time tracker?

20 A. No, we didn't have, like,  
21 billable hours; so that's what they called  
22 it, sorry, was billable hours, is what they  
23 actually called it.

24 Q. And that was a concept that was  
25 introduced around May of 2018 when this time

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1 tracker system was put in place?

2 A. It was a little bit before then,  
3 but around about. I want to say it was  
4 probably more so like 2017, like, the end of  
5 2017. I could be a little off, but....

6 Q. Okay. So you're changing the  
7 estimate, which is fine.

8 A. Yeah, because I'm not absolutely  
9 sure --

10 Q. And you just told me that.

11 A. I'm just trying to guesstimate.

12 Q. Okay. Okay.

13 A. But I'm thinking like the last  
14 meeting it may have been brought up and then  
15 we implemented.

16 Q. Okay.

17 A. I can't remember.

18 Q. There was some period of time at  
19 the beginning of your employment where you  
20 were not identifying, in any form, the hours  
21 that you worked from week to week?

22 A. That is correct.

23 Q. And at some point, maybe May,  
24 maybe earlier, you started doing through time  
25 tracker a process whereby you would identify

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1 the time?

2 A. That is correct.

3 Q. On a weekly basis?

4 A. Correct. Yes.

5 Q. And did you designate what was  
6 billable or what wasn't or did the system do  
7 that?

8 A. No, management did that.

9 Q. Okay. What did you record? Did  
10 you just, like, indicate what you did in a  
11 narrative form?

12 A. As far as billable time is  
13 concerned?

14 Q. No, as far as completing time  
15 track. Let's say you, for example, did a  
16 power user training for eight hours at a  
17 client site. What would you -- would you just  
18 list that in narrative form or was there,  
19 like, a code that you would put in? Or what  
20 were you inputting into the system?

21 A. So I would enter in the number  
22 of hours and then a very brief description.  
23 So I would put something like "ES training,"  
24 which is end user supervisor training.

25 Q. Okay.

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1 Did you have any understanding of  
2 why this change was instituted?

3 A. No.

4 Q. That wasn't something that was  
5 covered in any type of training or anything  
6 like that?

7 A. As to why they were doing -- I  
8 mean, I just assumed it was something with  
9 Tyler that they probably did, like, billable  
10 hours or something.

11 Q. Okay.

12 MR. MCKEEBY: And -- so you have  
13 -- I only have two of these. It's the  
14 timesheets?

15 MR. HERRINGTON: Okay.

16 Q. (By Mr. McKeeby) Let me mark this  
17 as deposition Exhibit 6.

18 (Whereupon, Exhibit 6 was marked  
19 for identification.)

20 Q. (By Mr. McKeeby) The good news is  
21 that I'm not going to go over these. But I do  
22 want to ask you about what they are.

23 A. Yes, sir.

24 Q. These are documents that, I'll  
25 represent to you, were produced by your



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1 counsel in this case. Do you recognize them?

2 A. Yes, sir.

3 Q. Am I correct that these are  
4 screenshots of your time tracker entries?

5 A. That is correct.

6 Q. How did you go about obtaining  
7 these to provide to your counsel?

8 A. Took a screenshot.

9 Q. Did you do that all at one time or  
10 did you do that periodically as you entered  
11 time?

12 A. No, I just did it all at one  
13 time.

14 Q. When did you do that?

15 A. I can't remember the exact date,  
16 but it was this year, 2019.

17 Q. 2019?

18 A. Yes, sir. For sure.

19 Q. Was it before or after you went  
20 out on FMLA leave?

21 A. I can't remember exactly. I  
22 would say around the same time, but I can't  
23 remember exactly --

24 Q. Okay.

25 A. -- when I actually did it.

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1 Q. Did you do it for the purposes of  
2 this lawsuit?

3 A. Yes, sir.

4 Q. And "it" being taking the  
5 screenshots of the time tracker entries?

6 A. Yes, sir.

7 Q. Does the date on this first --  
8 think I did my best to put these in  
9 chronological order. Assuming that I did it  
10 correctly, does this refresh your recollection  
11 as to when time tracker was introduced?

12 A. Yeah. So it was then, like, the  
13 beginning of 2018 then.

14 Q. Okay. So do these screenshots  
15 accurately depict the number of hours that you  
16 worked in the time periods identified?

17 A. No, sir, because I didn't add  
18 anything that I did Saturday or Sunday, and  
19 really my biggest thing was just making sure  
20 it met 40 hours. So no, this would not be  
21 completely accurate.

22 Q. It's not completely accurate  
23 because you would not have entered time for  
24 Saturday or Sunday?

25 A. Saturdays and Sundays,

1 generally, whenever I worked on the weekends,  
2 because a lot of times I would work over  
3 those days, but if it was admin or something  
4 of that sort, troubleshoot, that wasn't being  
5 accounted for, I wouldn't add that on here.

6 Q. But there's certainly time that's  
7 listed here that's not billable; correct?

8 A. Correct.

9 Q. I mean, administrative time is  
10 listed?

11 A. Yes, sir.

12 Q. You're just saying that for your  
13 weekend time, it wasn't your habit to enter  
14 that time?

15 A. That is correct.

16 Q. Did you ever tell anyone that that  
17 was the case?

18 A. No, because their biggest thing  
19 was just making sure it met the 40 hours, so  
20 it wasn't really anything that was relevant  
21 to bring up.

22 Q. And when you say, "their biggest  
23 thing," you're talking about your supervisors  
24 at Tyler?

25 A. I'm sorry, yes, Tyler.

1 Q. And Hillary Pasch, you mean?

2 A. Uh-huh. As well as Jamie,  
3 because they really, more so, handled  
4 timesheets and stuff like that. I believe it  
5 was actually Jamie that handled the  
6 timesheets.

7 Q. Handled them meaning what?

8 A. Meaning just -- like that's who  
9 it goes to for approval before the client  
10 actually gets billed. Because the biggest  
11 thing they're looking for in the timesheets  
12 is the billable hours that are going over to  
13 the client.

14 Q. That's based on communications you  
15 received from Jamie Burns? When you say the  
16 biggest thing with the timesheet was --

17 A. Well, that's an assumption.

18 Q. Okay. If someone -- if Ms. Burns  
19 or Ms. Pasch, in this case, testified that  
20 their understanding was that employees who  
21 were entering time in time tracker, including  
22 implementation consultants, were supposed to  
23 record all of their work time, would you  
24 disagree with that?

25 A. I mean, if they were under that

1 impression, I was unaware that every single  
2 item that you did had to be recorded, so.

3 Q. You would -- if they testified  
4 that that's something that they instructed  
5 implementation consultants to do, to record  
6 all of their time in time tracker, you would  
7 say you didn't hear that instruction?

8 A. I would say that that wasn't  
9 anything that was relayed to us as far as,  
10 make sure you put every single minute that  
11 you spend, put on this time tracker.

12 Q. Okay. Is there any other document  
13 that you have in your possession that would  
14 identify the number of hours that you worked  
15 on a week-to-week basis?

16 A. An actual document, so to say?

17 Q. Yes.

18 A. No, sir.

19 Q. When you say "actual document,"  
20 that sounds like a qualifier. Is there  
21 something other than an actual document?

22 A. No -- well, you said "document."

23 Q. I did say document.

24 A. So when you're saying a  
25 document, I'm saying no. The answer would be

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1 no.

2 Q. Okay. So you didn't take journal  
3 entries or diary entries to record your time  
4 or anything like that?

5 A. Not consistently, no, sir.  
6 Huh-uh.

7 Q. Well, you didn't do it at all, did  
8 you?

9 A. No, you just -- you get the  
10 project done, you get it done and you keep  
11 working.

12 Q. No, I understand. But if you were  
13 trying to keep track of what your hours were,  
14 you might enter them into a journal or a  
15 diary, I'm just saying you didn't do that;  
16 correct?

17 A. I had no reason to keep track of  
18 my hours.

19 Q. And you didn't do it?

20 A. That's correct.

21 Q. Okay. So you would say that for  
22 the purposes of quantifying the number of  
23 hours that you worked, these documents that  
24 I've marked as Exhibit 6, the time tracker  
25 screenshots, wouldn't be of any particular

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1 use?

2 A. I would say they're not 100  
3 percent accurate, is what I would say to  
4 that.

5 Q. Are any of them accurate?

6 A. As far as the exact time, no,  
7 because I didn't enter Saturday or Sunday's  
8 time that I actually worked or did things.

9 Q. And your testimony is that you  
10 worked every Saturday or Sunday?

11 A. If I did not work -- I wouldn't  
12 say every Saturday or Sunday, because it  
13 varied based on my workload --

14 Q. Sure.

15 A. -- and what I had going on that  
16 week.

17 Q. Sure.

18 A. So I wouldn't say consistently  
19 every single Saturday or Sunday, but majority  
20 of them, yes, sir, as well as additional  
21 hours on the week.

22 Q. Well, what's that last part,  
23 "additional hours on the week"?

24 A. During the week.

25 Q. So now you're saying that there's

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1 sometimes that there were hours during the  
2 week that you chose not to record as well?

3 A. No. I'm saying that sometimes I  
4 would exceed the eight hours during the week  
5 as well.

6 Q. Okay. And are you saying that on  
7 those -- in those instances, you would not  
8 record the time?

9 A. It just depended if it was  
10 billable or not. So it really depends on  
11 what type of time. Because everything  
12 billable had to be put down. Like, that was  
13 very important to make sure all billable time  
14 is recorded.

15 Q. I understand. But you also  
16 recorded time that was not billable, we've  
17 established?

18 A. Yes, sir.

19 Q. Is it your testimony then that  
20 when you had eight hours for a day of total  
21 time, that you would not record additional  
22 time in time tracker even if you worked that  
23 time?

24 A. There may have been certain  
25 circumstances where that did happen.



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1 Q. And when you say, "There may have  
2 been certain circumstances," is that because  
3 you're not sure or you know that happened,  
4 you're just not sure when? But -- I'm  
5 confused.

6 A. Well, I mean, it's -- we're  
7 talking going back three years.

8 Q. I know. But you told me that  
9 there were specific times that -- you knew  
10 that there were weekends that you worked --

11 A. Yes, sir.

12 Q. -- where you did not record your  
13 time; right?

14 A. Uh-huh.

15 Q. Is that yes?

16 A. That is correct, yes.

17 Q. You also know and can say under  
18 oath that there were times during the work  
19 week, not weekends, where you worked time that  
20 you did not record?

21 A. Yes.

22 Q. Okay. And that would happen how  
23 often?

24 A. It -- once again, depends on the  
25 workload and what I had going on that week.

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1 Some weeks I would work an extra ten hours,  
2 some weeks it would be six or something of  
3 that sort. It varied and it really depended  
4 on what needed to be completed, what open  
5 items I had -- there was a number of things  
6 that would kind of determine.

7 Q. Okay. So back, I think, to a  
8 previous question.

9 A. Uh-huh.

10 Q. Is it your testimony that none of  
11 these screenshots accurately reflect the  
12 number of hours that you worked in a week?

13 A. I would need to go back and see  
14 if any of them are completely accurate,  
15 because you'll even see that some I did put  
16 additional time on there as well. If you do  
17 look through some of them.

18 Q. Right. Some of these have more  
19 than 40 hours.

20 A. Yes, sir.

21 Q. And how do you account for that?

22 A. Well, because if it was  
23 something that was important or that I needed  
24 to put on the tracker to know that it was  
25 done, I would, of course, add it. For sure.

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1 Q. That was a determination you would  
2 make?

3 A. Yeah, that's a determination I  
4 would make, if it was something that was  
5 imperative that I needed to put on there.  
6 But if it was something that was not as  
7 important, then I wouldn't.

8 Q. But "imperative" is not the same  
9 as "billable"?

10 A. Correct. Yes, sir.

11 Q. And you would agree with me that  
12 you took a screenshot of every pay period  
13 between January of 2018 and October of 2018?

14 A. One second. Let me check the  
15 dates on these.

16 To October, yes, sir.

17 Q. Okay. How often would you work on  
18 the weekends where you wouldn't record your  
19 time? Is that something that happened every  
20 other weekend, once a month, more than that?

21 A. More than that.

22 Q. Every other weekend?

23 A. Probably more than that too. It  
24 was pretty -- it was pretty often that I was  
25 working at least one day on the weekend.

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1 Q. Do you have an estimate of the  
2 number of hours that you worked -- let me  
3 scratch that.

4 2018, could you have -- if you  
5 wanted to -- the last one of these time  
6 tracker screenshots is October 21st, 2018;  
7 correct?

8 A. Yes, sir.

9 Q. Could you have taken screenshots  
10 after that date and produced them in this  
11 case?

12 A. Well, November 2018 is when we  
13 had the change that took place.

14 Q. Okay. But you still kept your  
15 time -- you entered billable time?

16 A. Only billable.

17 Q. Right. Okay. So if you took a  
18 screenshot for November of 2018 -- I don't  
19 know what the day would be, but I guess we  
20 could probably figure it out -- so I think it  
21 would be maybe November -- let's say November  
22 12th was the end of a pay period. You could  
23 take a screenshot of that, but it would not  
24 have -- it would not have shown anything other  
25 than billable time?

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1 A. That's correct.

2 Q. So you didn't do that, because --  
3 well, why didn't you do that?

4 A. I don't have a good answer for  
5 that.

6 Q. But you could have?

7 A. Yeah, I probably could have.

8 Q. As of that time when you started  
9 tracking only billable time, you were no  
10 longer including the admin time?

11 A. No, we weren't including  
12 anything else but billable.

13 Q. Do you intend to tell the jury in  
14 this case how much overtime you worked on a  
15 weekly basis?

16 A. Yes, sir.

17 Q. What do you intend to say?

18 A. Well, to be on the safe side,  
19 just because integrity is everything and I  
20 know I've at least worked an extra five hours  
21 a week, in cases definitely more than that,  
22 but I would rather under estimate than over  
23 estimate, so I would say about 45.

24 Q. But there's no real way to  
25 determine what the correct number would be;

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1 correct?

2 A. That's correct, yes, sir.

3 Q. And these documents would at least  
4 show -- these timesheets that I've identified  
5 as Exhibit 6, would at least show certain  
6 instances where you worked more than 40 hours;  
7 correct?

8 A. Some of them will, yes, sir.  
9 Uh-huh.

10 Q. I'm sorry. Did you tell me or --  
11 well, let me just ask it again, I apologize.

12 Did you print these out before or  
13 after you went on FMLA leave?

14 A. I can't recall if it was before  
15 or after.

16 Q. When you went out on FMLA leave,  
17 were you considering legal action at that  
18 time?

19 A. At the time I went on the leave,  
20 no.

21 Q. You hadn't been referred to  
22 counsel by your sister at that time?

23 A. I had been referred, but I  
24 wasn't -- I was on the fence completely. So  
25 I wasn't at a moment where I'm, like, yes,

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1 I'm definitely going to move forward with  
2 this. So no, it was not a definite.

3 Q. But it's accurate to say you were  
4 considering legal action?

5 A. Considering, yes, sir.

6 Q. Have you -- while you were  
7 employed at Tyler, did you ever discuss the  
8 possibility of taking legal action against  
9 Tyler with any other Tyler employee?

10 A. No.

11 Q. Since you have taken legal action  
12 against Tyler, have you had any discussions  
13 with any Tyler employee or former employee  
14 about your lawsuit?

15 A. No, I don't really talk to  
16 anybody from my old job.

17 Q. Are you still in touch with  
18 Ms. Harrison?

19 A. Every blue moon, we'll check on  
20 each other but not consistently.

21 Q. Have you told her that you filed a  
22 lawsuit?

23 A. No. She still works there.

24 Q. And why does that matter?

25 A. Because he told me not to talk

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1 to anybody about it.

2 Q. Okay. Well, don't tell me what he  
3 told you.

4 A. Okay.

5 Q. Tell me again, the job that you  
6 held before Tyler, Allconnect?

7 A. Allconnect? Yeah, that was  
8 right before Tyler.

9 Q. And you were in sales at that job?

10 A. Yes, sir.

11 Q. Why did you leave that position?

12 A. Because it was a very, very far  
13 commute, and I wasn't making enough money.

14 Q. Did you leave voluntarily?

15 A. Yes, sir.

16 Q. In that role, you said it was a  
17 sales role, did you receive commissions?

18 A. Yes, sir.

19 Q. Was that the only way you were  
20 compensated at Allconnect?

21 A. No, we had a base rate as well,  
22 in addition to the incentives.

23 Q. You would agree with me that at no  
24 point at Tyler -- while you were employed with  
25 either ExecuTime or Tyler, did you receive



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1 commissions?

2 A. Repeat that question.

3 Q. It's a true statement that at no  
4 point during your employment with either  
5 ExecuTime or Tyler that you received  
6 commissions?

7 MR. HERRINGTON: I'm going to  
8 object to the extent it calls for a legal  
9 conclusion about what commissions are.

10 Q. (By Mr. McKeeby) Commissions as  
11 you would use the term.

12 A. Billable hours?

13 Q. Well, how do you define  
14 commissions, let's do that?

15 A. I mean, I would define  
16 commission as additional money in addition to  
17 your salary, wage.

18 Q. So the same thing as a bonus?

19 A. Something like a bonus, that's  
20 the way I would think of it.

21 Q. How about if we define it a  
22 different way or we can call it something  
23 different too. When you were paid at  
24 Allconnect, what was it that you were selling?

25 A. Like cable TV, internet, stuff

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1 like that.

2 Q. And who were you selling to,  
3 businesses?

4 A. Just different clients,  
5 different people.

6 Q. Okay. And when you generated a  
7 sale, did you receive a percentage of that  
8 sale as a commission?

9 A. I'm not sure how their -- let me  
10 not answer that with no. I'm not sure how  
11 their incentive structure worked to see how  
12 they based the pay out, so I can't answer  
13 that.

14 Q. Okay.  
15 But you would agree with me that  
16 when the sales team at ExecuTime or Tyler made  
17 a sale, that did not trigger any income  
18 entitlement to you?

19 A. Not that I'm aware of, no.

20 Q. Well, you would know, wouldn't  
21 you?

22 A. I'm not sure. I mean, how would  
23 I know?

24 Q. Because you would get the money.

25 A. Well, I never -- not that I'm

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1 aware of, no.

2 Q. Okay. Were you ever on a  
3 performance improvement plan at Tyler?

4 A. Yes, sir.

5 Q. When was that?

6 A. I can't tell you the exact date,  
7 because I can't remember.

8 Q. Was it in 2019?

9 A. I don't believe so.

10 Q. Were you aware that Ms. Pasch had  
11 drafted a performance improvement plan for you  
12 prior to you going out on medical leave?

13 A. No.

14 Q. Is this the first you're hearing  
15 of it?

16 A. Uh-huh, it is.

17 Q. Is that yes?

18 A. Yes, that's a yes.

19 MR. MCKEEBY: Let me take five  
20 minutes. I may be done.

21 THE VIDEOGRAPHER: Going off the  
22 record at 2:21.

23 (A short break was taken.)

24 THE VIDEOGRAPHER: Back on the  
25 record at 2:27.

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1 Q. (By Mr. McKeeby) Ms. Greene, did  
2 you have a monthly call with Ms. Pasch?

3 A. We started doing those, yes.

4 Q. At what point did you start doing  
5 those?

6 A. I can't recall the time we  
7 started doing them, but that is something  
8 that she started doing, was monthly calls.

9 Q. Was it in 2018?

10 A. Around sometime in there,  
11 probably so.

12 Q. Okay. And was it a monthly call  
13 between just you and her, or was it a monthly  
14 call with all implementers?

15 A. Well, we did a monthly call with  
16 just me and her, she would meet with people  
17 separate as she started doing that.

18 Q. Okay. And your -- she wouldn't  
19 meet with you face to face, that would  
20 typically be done over a telephone call?

21 A. Yes, sir, or a GoToMeeting.

22 Q. GoToMeeting is a?

23 A. It's like a Skype call --

24 Q. Skype call.

25 A. -- where you can share screens

1 and stuff.

2 Q. Okay. And would you discuss the  
3 progress of your implementations during those  
4 calls?

5 A. Yes, sir.

6 Q. What does it mean to put an  
7 implementation on hold?

8 A. That is -- that's what I was  
9 referring to earlier when a client may say,  
10 we need a little bit more time or we had  
11 another project come up or something came up.  
12 There's been situations where, you know,  
13 maybe someone on the project managing team  
14 had to have surgery.

15 There are so many things, but  
16 those are several examples of what would be  
17 considered quote, unquote on hold.

18 Q. So you would put the Go-Live date  
19 on hold; is that what was being put on hold?

20 A. Yes, sir.

21 Q. Would that be one of the things  
22 you would talk to Ms. Pasch about during these  
23 monthly calls?

24 A. No, because they handled the  
25 Go-Live date. I would just tell them the --

1 you know, essentially the client is  
2 requesting to put on hold, and they would  
3 take it from there.

4 Q. "They" being who?

5 A. The project manager as well as  
6 the implementation manager.

7 Q. And the calls with Ms. Pasch, did  
8 you discuss the progress of the  
9 implementations and whether or not deadlines  
10 were being met?

11 A. That was more so on the group  
12 call, with me as well as the project manager.  
13 The one-on-one calls, not as much.

14 Q. What did you discuss during the  
15 one-on-one calls?

16 A. Just different things that may  
17 come up, different issues, things of that  
18 sort. And, of course, you know, the projects  
19 would come up as well. But we went into more  
20 depth when it was all three of us on the call  
21 in regards to timelines and stuff.

22 Q. And you mean all three, you mean,  
23 you, Ms. Pasch and the project manager?

24 A. Yes, sir.

25 Q. And was that a call that happened

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1 regularly?

2 A. She started doing that as well.

3 Q. That was a separate monthly call?

4 A. Yes.

5 Q. On those calls, did you discuss  
6 the status of the implementations and whether  
7 or not there were any delays in the checklist  
8 of deadlines?

9 A. Yes, sir.

10 MR. MCKEEBY: No further  
11 questions at this time.

12 MR. HERRINGTON: Nothing for me.  
13 Read and sign.

14 THE VIDEOGRAPHER: Going off the  
15 record at 2:30.

16 (The deposition concluded at 2:30 p.m.)  
17  
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C E R T I F I C A T E

STATE OF GEORGIA)

COUNTY OF FULTON)

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction, that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said hearing.

I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.



Cindy C. Jenkins

Certified Court Reporter, 470



## D I S C L O S U R E

I, Cindy C. Jenkins, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that Esquire was contacted by the party taking the deposition to provide court reporting services for this deposition and there is no contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) of Article 7.C. of the Rules and regulations of the Board for the taking of this deposition.

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---

Cindy C. Jenkins

Certified Court Reporter, 470

DEPOSITION ERRATA SHEET

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that  
I have read the entire transcript of  
my Deposition taken in the captioned matter  
or the same has been read to me, and  
the same is true and accurate, save and  
except for changes and/or corrections, if  
any, as indicated by me on the DEPOSITION  
ERRATA SHEET hereof, with the understanding  
that I offer these changes as if still under  
oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Suzanne Greene

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## DEPOSITION ERRATA SHEET

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SUZANNE GREENE  
 SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019  
 Index: vague..worried

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SUZANNE GREENE  
SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019  
Index: worries..years

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ENTERPRISE WORKFORCE MANAGEMENT

January 12, 2016

Suzanne Green

Redacted

Ellenwood, GA 30294

Re: Offer of Employment

Dear Ms Green,

ExecuTime is pleased to confirm the terms under which it extends to you an offer of employment. We trust that your knowledge, skills, and experience will be among our most valuable assets.

**Position:** Project Manager / Trainer

**Start Date:** February 1, 2016

**Place of Employment:** ExecuTime Office: 2400 Crestwood Rd, Suite 102, North Little Rock, AR, with granted permission to work from remote office in Ellenwood, GA.

**Salary:** Annual salary of \$45,000, less all applicable withholdings, paid no less frequently than monthly. This quote is merely for convenience and does not imply employment for any specific period. Your position is exempt from the overtime provisions of the Fair Labor Standards Act.

**Bonus Opportunity:** You may be eligible for participation in certain bonus programs. Of course, all bonus programs are established and administered in ExecuTime's discretion.

**Benefits:** As a full-time ExecuTime employee, you will be eligible to receive or participate in the benefits offered to each of our employees. For details, please refer to the appropriate Employee Handbook, summary plan description, or contact your supervisor.

**Paid Time Off:** Per Company policy.

**Expenses:** ExecuTime will reimburse you for normal and reasonable expenses incurred on its behalf, provided you submit a properly supported expense report within two months of the close of the month in which the expense was incurred. Direct any questions about expense reimbursement to your supervisor prior to incurring the expense.

[www.executime.com](http://www.executime.com)

TYLER-GREENE 000001





ENTERPRISE WORKFORCE MANAGEMENT

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**Other Agreements and Acknowledgements:**

**Adherence to ExecuTime's Policies on Intellectual Property:** You agree to adhere to all such policies, as stated herein or elsewhere. ExecuTime retains its interest in all intellectual property rights, including but not limited to all rights relating to formulas, processes, inventions, utility models, trademarks, service marks, business names, copyrights, design rights, patents, trade secrets, computer programs, databases and source codes, that are developed, created or acquired by you (whether alone or jointly with other person(s)) on behalf of or for ExecuTime during the course of employment.

**Adherence to ExecuTime's Confidentiality Policies:** You agree to adhere to all such policies, as stated herein or elsewhere. ExecuTime requires that you not make use of or divulge to persons not concerned any proprietary information that may come to your knowledge during the course of employment. ExecuTime requires employees to use their best endeavors to prevent the disclosure and unauthorized use of such information. Such information refers to information and documents such as, but not limited to, strategic and marketing plans, customer lists, prospect lists, contracts and pricing information. Your obligation hereunder survives your separation from employment, regardless of the circumstances.

**At-will Employment:** You acknowledge that business circumstances change and ExecuTime needs the flexibility to respond effectively. Therefore, you understand that this offer is not a promise of employment for a specific period of time or under any guarantee of terms and conditions. All employees of ExecuTime are employed at-will which means either the employee or ExecuTime may terminate the employment relationship at any time with or without notice or cause without any liability for so doing. Only a written document signed by both the president of ExecuTime can alter this policy.

**Representations and Warranties of Applicant.** You hereby represent and warrant to ExecuTime that you (i) are not subject to any written nonsolicitation or noncompetition agreement that would affect your employment with ExecuTime, (ii) are not subject to any written confidentiality or non-use/non-disclosure agreement that would affect your employment with ExecuTime, and (iii) will not bring to ExecuTime any trade secrets, confidential business information, documents, or other personal property of any other person or entity in violation of any agreement or any applicable law, rule, or regulation.

**This offer is conditioned upon**

- Your acceptance of this offer without modification by signing below
- Your agreement to strictly abide by all ExecuTime policies and procedures

We look forward to you joining ExecuTime and believe you will make a valuable contribution toward our success. Please confirm your acceptance by signing where indicated and returning the signed letter to:

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[www.executime.com](http://www.executime.com)

TYLER-GREENE 000002



| ENTERPRISE WORKFORCE MANAGEMENT |

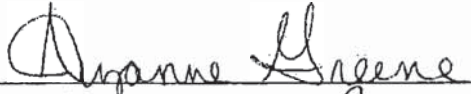
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Email Signed Copy: [talia.harrison@executime.com](mailto:talia.harrison@executime.com)  
Original Copy: Bring on first day of employment

Sincerely,

Talia Harrison  
ExecuTime Software, LLC

By signing this letter, I accept and agree to the terms set for the herein:

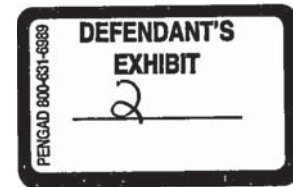
Signature:   
Printed Name: Suzanne Greene  
Date: 01-12-2016

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TYLER-GREENE 000003

Suzanne F. Greene  
Cell [REDACTED]  
E-Mail: [REDACTED]



Objective: To obtain a leadership role in a company which offers opportunities for career advancement in a team oriented environment.

Employer: Tyler Technologies  
Title: Implementation Consultant  
Duration: February 2016 – Present  
Job Duties

- Manage multiple client implementations simultaneously, while meeting all project plan deadlines.
- Build, lead and direct project teams to meet project objectives
- Strong leadership and delegation skills
- Set clear expectations and goals for project teams. Track progress against timeline, milestones and budget, revise as needed
- Hold regularly scheduled meetings with the client to ensure that milestones are met
- Provide software application training using a variety of delivery methods including web-based and on-site training
- Coordinate new customer implementations, providing effective training to maximize use the software
- Excellent communication (written and oral) and interpersonal skills
- Effective at engaging with people from all backgrounds and work industries

Employer: Allconnect  
Title: Sales/Customer Service  
Duration: August 2015 – January 2016  
Job Duties:

- Detail oriented in order to ensure accuracy of information delivered to consumers and recorded for processing
- Utilizes consultative selling techniques to present key selling points, features and benefits while remaining focused on the customers' needs and expectations
- Demonstrates persistence, manage objections and strive to improve my skills and sales performance
- Effectively communicates and build relationships with customers to provide a world class customer experience
- Consistently exceed monthly sales objectives
- Effectively executes the entire sales process from opening to close while ensuring customer satisfaction

Employer: Highland Mortgage  
Title: Loan Partner 1/Production Assistant  
Duration: April 2014 – July 2015  
Job Duties:

- Deliver performance excellence to mortgage/loan customers to ensure the origination of the relevant and appropriate loan products to meet their financial needs
- Observe the servicing practices of the mortgage branch team and management level associates from the customer perspective to develop and implement performance improvements
- Partner with manager and team to ensure operational excellence of the center and maintain a high level of customer satisfaction.
- Monitor the daily activities of the Branch including workflow, forecasting and customer satisfaction.



- Develop marketing strategies to build our customer base and maintain our current customer portfolio
- Create workforce stability by cultivating a productive and enthusiastic business team.
- Review team performance with manager and reinforce the accountability expectations for team and self.
- Establish communication, training and reporting processes to ensure the branch is operating to most current operational and security processes.
- Coach new hires to demonstrate professionalism, discretion and independent judgment, when performing work responsibilities.

Employer: Verizon

Title: Sales/Customer Retention/Service Representative

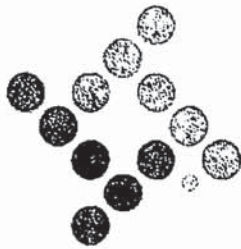
Duration: July 2006 – September 2013

Job Duties:

- Serviced 150 calls per day and resolved customer service inquiries on account related issues
- Achieved and maintained exceptional quality, productivity and sales results.
- Analyze customer portfolios to determine the best cross sell and upgrade opportunities
- Motivate team to maximize potential in all aspects of their job.
- Excellent verbal communication recommending relevant products to customers to deepen their business relationship with company
- Consistently exceeded incentive plans for top performing associates.
- Partner with executives to identify process improvements and develop counter measures to prevent the regression to previous ineffective performance practices
- Research and resolve escalated issues for customers and/or clients in an efficient and timely manner while transitioning to sales
- Take ownership for the resolution of customer complaints and resolved them in a manner that would ensure the retention of high valued customers
- Manage upset customers, conflicts and challenging situations
- Coached new team members to make a smooth transition to the live environment

Skills:

TSYS (Total Systems), Frontier, Microsoft Word, Excel, Outlook, and Power Point,



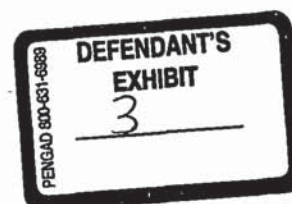
**executime**<sup>TM</sup>  
a total tyler solution

**Turlock, CA**

**Timekeeping Power User Training  
Onsite Agenda**

**May 22 – 24, 2018**

MyKeya Henderson, Project Manager  
Suzi Greene, Implementation Consultant/Onsite Trainer





## Pre-Work

- Prepare detailed list of pay codes and how they are used (e.g. if the pay code count towards overtime, if the pay code is restricted to specific departments/division)
- Prepare detailed list of all policies (e.g. overtime, comp time, special pay, etc.)
- Prepare detailed list of all holidays for each department/division, including the number of hours and any special pay practices or requirements.
- Print copies of reference material provided by Tyler for each attendee as applicable
  - Onsite Agenda
  - ExecuTime Pay Codes
  - Go Live Checklist – Power User Training
  - Policies
  - Holidays
  - Pay Codes

## Meeting Room Setup and Resources:

- Display Projector (overhead or connection to screens meeting attendees can see)
- High Speed Internet connection (required for all our products.)
- Working space for Tyler resources (when not conducting meetings)
- Security credentials (if applicable)
- Access to parking in close proximity to meeting location(s)

## Agenda

### Tuesday, May 22, 2018

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8:30am – 9:00am	Tyler Technologies Arrival and Introductions
9:00am – 10:00am	Training: Admin Overview of Employee Actions, Supervisor Actions, Reporting
10:00am – 10:15am	Break
10:15am – 11:45am	System Admin Training: Master File Management
12:00pm – 1:00pm	Lunch
1:15pm – 2:30pm	Workshop: Pay Codes
2:30pm – 2:45pm	Break
2:45pm – 4:45pm	Workshop: Pay Codes
4:45pm – 5:00pm	Wrap-up Discussion
5:00pm	Tyler Technologies Departure




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**Wednesday, May 23, 2018**


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8:15am – 8:30am	Tyler Technologies Arrival
8:30am – 9:30am	System Admin Training: Messages and Policies & Rules Engine
9:30am – 9:45am	Break
9:45am – 11:45am	Workshop: Review and Test Overtime & Comp Time Policies
12:00pm – 1:00pm	Lunch
1:15pm – 2:15pm	Workshop: Review and Test Overtime & Comp Time Policies
2:15pm – 2:30pm	Break
2:30pm – 3:45pm	System Admin Training: Schedule Maintenance – Security & Permissions
3:45pm – 4:45pm	Workshop: Security & Permissions
4:45pm – 5:00pm	Wrap-up Discussions
5:00pm	Tyler Technologies Departure

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**Thursday, May 24, 2018**


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8:15am – 8:30am	Tyler Technologies Arrival
8:30am – 10:30am	Workshop: Security & Permissions
10:30am – 10:45am	Break
10:45am – 11:45am	Payroll Functions Training: Bulk Transactions and Holiday schedules Workshop: Holiday Schedules
12:00pm – 1:00pm	Lunch
1:15pm – 2:45pm	Workshop: Holiday Schedules
2:45pm – 3:00pm	Break
3:00pm – 5:00pm	Open Action Items Discussion and Project Plan Review





ENTERPRISE WORKFORCE MANAGEMENT

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(PTS: 1/8/2019) Turlock, CA - Timekeeping Imp (Self-Hosted/New World/Mobile/Clocks)

(D) (XTNI-16143)

[XTNI-19909] Turlock, CA - Onsite Agenda for Power User Training [Billing-

Suzi] Created: Mar/07/2018 Updated: May/20/2018 Due: May/15/2018 Resolved: May/20/2018

Status: Resolved

Project: Moved - Read Only - XTNI - New Implementations

Component/s: None

Affects: None

Version/s:

Fix Version/s: None

Type: Sub-task

Priority: Medium

Reporter: MyKeya Henderson  
(Inactive)

Assignee: Suzanne Greene (Inactive)

Resolution: Fixed

Votes: 0

Labels: None

Remaining  
Estimate: 25 minutes

Time Spent: 1 hour, 47 minutes

Original  
Estimate: Not SpecifiedAttachments: ☒ Turlock CA - Onsite Agenda.pdf ☒ Turlock, CA - Onsite  
Agenda.docx

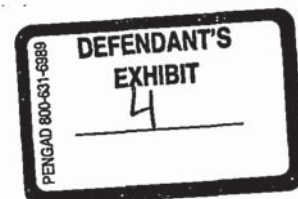
Customer: Turlock, CA

BILLING

1h 33m (5/16) Billed on 5/21/18 - Suzi (Along with other  
tickets)

Confirm agenda with client at least 3 days prior to departure for onsite

Comment by MyKeya Henderson (Inactive) [ May/11/2018 ]



Hi Suzi,

This subtask has been assigned to you. The agenda will need to be sent to Alison Arias for approval by EOB 5/15/18. Be sure to include all pre-work the client will need for the onsite (e.g. printed list of pay codes, detailed policies, etc.). There is a sample agenda in our team resource folder.

Also, because this is a 3-day Power User Training and Workshop, be sure to allot sufficient time to complete all items on the Power User checklist with the client. You should have a completed Power User Checklist upon your departure from Turlock.

Comment by Suzanne Greene (Inactive) [ May/16/2018 ]

From: Greene, Suzanne

Sent: Wednesday, May 16, 2018 4:16 PM

To: Henderson, MyKeya <MyKeya.Henderson@tylertech.com>

Subject: Turlock Onsite Agenda

Hi MyKeya,

Attached is my onsite agenda for Turlock. Please let me know if you think I need to make any modifications ☺

Thanks,

Suzanne Greene

Implementation Consultant

Tyler Technologies, Inc.

P: 800.772.2260 ext. 5119

[www.tylertech.com](http://www.tylertech.com)

Comment by Suzanne Greene (Inactive) [ May/16/2018 ]

From: Greene, Suzanne

Sent: Wednesday, May 16, 2018 7:17 PM

To: aarias@turlock.ca.us

Cc: Henderson, MyKeya <MyKeya.Henderson@tylertech.com>

Subject: Turlock, CA - Onsite Agenda / Call with Allison

Hi Allison,

It was a pleasure speaking with you today ! Please see below the items we discussed.

- Power User Checklist
  - o We reviewed the Power user checklist in detail. Project Plan > Go Live Checklist > Power User Training
- Onsite agenda

- o Discussed the workshops.
- o Attached is the onsite agenda for next week.
- Pay codes
- o Went through the hours code list sent to ExecuTime

Please don't hesitate to reach out to me if you have any questions at all. I'm looking forward to next week 😊

Suzi Greene  
Implementation Consultant  
Tyler Technologies, Inc.

P: 800.772.2260 ext. 5119

[www.tylertech.com](http://www.tylertech.com)

Comment by MyKeya Henderson (Inactive) [ May/17/2018 ]

From: Henderson, MyKeya  
Sent: Thursday, May 17, 2018 11:28 AM  
To: Greene, Suzanne <Suzanne.Greene@tylertech.com>  
Cc: Henderson, MyKeya <MyKeya.Henderson@tylertech.com>  
Subject: RE: Turlock Onsite Agenda

No worries. Please see the below updates. Also, please be sure to start on these prior to the due date to ensure we have time to review and meet our target dates with the client.

- Add comma after "24" on the cover page (between 24 and the year)
- You can remove my information from the cover page since I will not be onsite with you
- Under Meeting Room Setup and Resources: bullet 3 can be removed since you have workshops throughout the day
- You'll want to arrive by 8am each day since they will be billed for 3 full 8-hour days (the time from 8:00 to 8:30 can be your prep/setup time).

Let me know if you have any questions!

MyKeya Henderson  
Project Manager  
P: 800.772.2260 ext. 4839

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From: Greene, Suzanne  
Sent: Wednesday, May 16, 2018 6:18 PM  
To: Henderson, MyKeya <MyKeya.Henderson@tylertech.com>  
Subject: RE: Turlock Onsite Agenda



Hey there .. don't worry about looking over this one I had to get it out to Allison I copied you on the email ☺

Thanks,

Suzanne Greene  
Implementation Consultant  
Tyler Technologies, Inc.

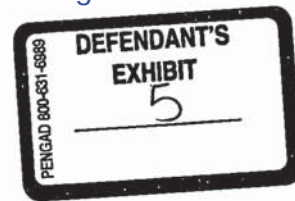
P: 800.772.2260 ext. 5119

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Empowering people who serve the public™



<b>Position Description</b>			
<b>Job Title:</b>	Implementation Consultant	<b>Date:</b>	1/1/11
<b>Department/Group:</b>	Implementation	<b>Grade:</b>	9
<b>Reports To:</b>	Project Manager	<b>Exemption Status:</b>	Exempt
<b>Position Objective</b>			
<p>The Implementation Consultant provides the highest quality instruction and support to clients during the implementation of Tyler software products. The consultant ensures that the transition to Tyler software is completed according to predetermined timelines and establishes a positive baseline for the new relationship between the client site and Tyler Technologies.</p>			
<b>Principal Duties</b>			
<ul style="list-style-type: none"> <li>• Provide professional and thorough training and consultation to clients on Tyler software products.</li> <li>• Perform consultation/analysis sessions on applicable Tyler products to determine the existing business model and create a new model to use in the deployment of the project.</li> <li>• Consult with users to identify the proper data mapping process for the product conversion.</li> <li>• Provide instruction on proofing and analyzing data conversions from existing software to Tyler applications.</li> <li>• Train users on data entry, system administration, user security, and user permissions.</li> <li>• Play an active role in troubleshooting client issues, or working with the support or development departments to resolve</li> <li>• Create custom reports or customize existing reports to satisfy client requirements.</li> <li>• Arrange travel upon receipt of schedule and at least two weeks in advance project start date to ensure cost effectiveness.</li> <li>• Keep up to date on administrative tasks such as documenting client issues, communicating agendas, submitting trip reports and weekly expense reports, and updating the client SharePoint site.</li> <li>• Design and conduct training sessions on site or through webinars.</li> <li>• Assist QA staff with product testing or modification testing as required.</li> <li>• Create both client-facing and internal documentation such as quick tips and how to's and participate in discussion boards on a regular basis to share information with other Tyler employees.</li> <li>• Stay current with new product releases and continue to advance product knowledge in specialized areas through self-study, participation in training sessions, development of videos, and the research and testing of product scenarios.</li> </ul>			
<b>Scope and Impact (Accountability)</b>			
<p>The Implementation Consultant position is a revenue-generating position. The quality of the implementation can directly affect the volume of work and the projects' profitability. The consultant conducts a minimum of 12 billable days of training per month to groups of up to 25 clients. He or she adheres to training assignments but must use independent judgment and available resources to successfully transition the client to Tyler software.</p>			
<b>Complexity</b>			
<p>The Implementation Consultant must be able to:</p> <ul style="list-style-type: none"> <li>• Expeditiously learn, understand, demonstrate, and train clients on Tyler software applications by following the implementation methodology approach.</li> <li>• Maintain a courteous, professional, and confident demeanor throughout the implementation process.</li> </ul>			



Empowering people who serve the public™

- Work with a diverse group of people, and adapt to and work in a dynamic environment.
- Instill client confidence in the use of Tyler applications by providing effective one-on-one or group training.
- Exercise good judgment, discretion, and tact while working with clients.
- Maintain the ability to perform the basic functions of the application on different data platforms.

#### **Education, Experience and Special Skills**

- Bachelor's degree in business or related field, or comparable work experience.
- Knowledge of principles and concepts in accounting desired
- Exceptional presentation and training skills desired
- Excellent interpersonal and communication skills.
- Familiarity and ease with computer systems and Microsoft Office products.
- Strong problem solving and analytical skills.
- Ability to travel extensively.
- Valid driver's license.



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General

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

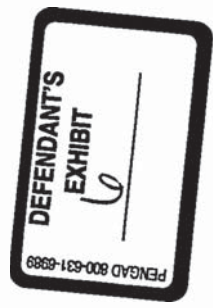
Type to search

Submit | Hide status | Show overtime

WEEK START: SUNDAY, JANUARY 28, 2018

Project	Task	Sun 28	Mon 29	Tue 30	Wed 31	Thu 1	Fri 2	Sat 3	Total
Non-projec...	Administ...					1.25			25.25/0.00
Non-projec...	Internal ...					1.00			1.00/0.00
Non-projec...	Paid Tim...						8.00		8.00/0.00
Alexander C...	Professi...					1.50			1.50/0.00
Coachella, ...	Professi...					1.50			1.50/0.00
Coppell, TX ...	Impleme...					1.25			1.25/0.00
Hendersonv...	Impleme...					1.50			1.50/0.00
	Total	0.00	8.00	8.00	8.00	8.00	8.00	0.00	40.00/0.00

Details



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General

TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

Week starting Sunday, February 04, 2018

Project	Task	Sun 4	Mon 5	Tue 6	Wed 7	Thu 8	Fri 9	Sat 10	Total
Non-projec...	Administ...		1.75	2.00	0.75		2.75		7.25/0.00
Non-projec...	Internal ...		2.25		1.00		2.00		5.25/0.00
Non-projec...	Weekda...				5.50	5.00	1.00		11.50/0.00
Alexander C...	Professi...		0.25	0.25		8.00			8.50/0.00
Coachella, ...	Professi...		0.50						0.50/0.00
Coppell, TX ...	Impleme...		0.50	1.50	1.00				3.00/0.00
Hendersonv...	Impleme...		2.75		0.50				3.25/0.00
Merrill Wi ...	Execu...			0.25	1.00				1.25/0.00
Portales, N...	Profe...			4.00					4.00/0.00
	Total	0.00	8.00	8.00	9.75	13.00	5.75	0.00	44.50/0.00

Details



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Time Sheet Options Filter

Non-project time Open tasks Regular tasks

Week start: Sunday, February 11, 2018

Submit | Hide status | Show overtime

Project	Task	Sun 11	Mon 12	Tue 13	Wed 14	Thu 15	Fri 16	Sat 17	Total
Non-projec...	Administ...								14.00/0.00
Non-projec...	Internal ...								6.75/0.00
Non-projec...	Paid Tim...								0.75/0.00
Non-projec...	Training ...								1.75/0.00
Alexander C...	Professi...								5.00/0.00
Coachella, ...	Professi...								3.50/0.00
Coppell, TX ...	Impleme...								2.50/0.00
Hendersonv...	Professi...								0.50/0.00
Hendersonv...	Impleme...								2.25/0.00
Merrill WI ...	Execu...								2.25/0.00
Portales, N...	PM/IC U...								2.50/0.00
	Total								41.75/0.00

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Submit | Hide status | Show overtime

Week start Sunday, February 18, 2018

Project	Task		Sun 18	Mon 19	Tue 20	Wed 21	Thu 22	Fri 23	Sat 24	Total
Non-projec...	Administ...									14.75/0.00
Non-projec...	Internal			5.00	3.00	2.25	1.50	3.00		3.50/0.00
Alexander C...	Professi...	100.00				0.25	1.50	1.75		1.00/0.00
Coachella, ...	Professi...	100.00			0.50		0.75			1.25/0.00
Coppell, TX ...	Impleme...	100.00		0.25	0.25	0.75	2.00			3.25/0.00
Glen Carbo...	Professi...	100.00				2.25		3.75		6.00/0.00
Hendersonv...	Professi...	100.00			0.50		1.50			0.50/0.00
Hendersonv...	Impleme...	98.30			2.25	0.25				4.00/0.00
KALAMAZO...	Professi...	100.00		1.75						1.75/0.00
Merrill, WI ...	Execu...	100.00		1.00		2.25				3.25/0.00
Portales, N...	Profe...	100.00			1.50					1.50/0.00
Total			0.00	8.00	8.00	8.00	8.25	8.50	0.00	40.75/0.00

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Time Sheet

Options

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Filter

TIME SHEET

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Week starting Sunday, February 25, 2018

Project	Task		Sun 25	Mon 26	Tue 27	Wed 28	Thu 1	Fri 2	Sat 3	Total
Non-projec...	Administ...			1.00	1.25	1.50	1.75	3.75		9.25/0.00
Non-projec...	Internal			1.75	1.00	2.75	2.50	0.50		8.50/0.00
Non-projec...	Sick Time			3.00	2.00			2.00		7.00/0.00
Non-projec...	Training					0.75				0.75/0.00
Alexander C...	Professi...	12/16/2016					0.25			0.25/0.00
Coachella, ...	Professi...	2/10/2017		1.50	2.50	2.75	1.75			8.50/0.00
Coppell, TX	Impleme...	10/22/2017					0.25			0.25/0.00
Glen Carbo...	Professi...	12/23/2016		0.75	0.50	0.50				1.75/0.00
Hendersonv...	Professi...	4/18/2017			0.25		1.00			1.25/0.00
Hendersonv...	Impleme...	12/15/2016			0.75		0.50			1.25/0.00
Lakeway, TX	Execu...	9/2/2017						1.50		1.50/0.00
Portales, N...	PM/IC U...	2/17/2018			8.25	8.25	8.00	8.00	0.00	40.50/0.00
	Total		0.00	8.00	8.25	8.25	8.00	8.00	0.00	40.50/0.00

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TIME SHEET

Options

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Filter

Submit | Hide status | Show overtime

WORK START: SUNDAY, MARCH 19, 2018

Project	Task		Sun 4	Mon 5	Tue 6	Wed 7	Thu 8	Fri 9	Sat 10	Total
Non-projec...	Administ...			2.75	2.75	3.50	2.00	5.50		16.50/0
Non-projec...	Internal ...			1.50	1.00	0.25	1.50	0.50		4.75/0
Antioch, CA...	Professi...	0.00		0.75		0.50				1.25/0
Burleson, T...	Execu...	1.00			0.50					0.50/0
Coachella, ...	Professi...	0.00		0.50	0.50	0.25	0.75	0.75		2.75/0
Coppell, TX ...	Impleme...	0.00		0.50	0.50	2.25	0.75	0.50		4.50/0
Glen Carbo...	Professi...	0.00			0.50		1.50	0.25		2.25/0
Hendersonv...	Professi...	0.00				0.50				0.50/0
Hendersonv...	Impleme...	1.00		0.50			0.75			1.25/0
Humboldt ...	Professi...	1.00			0.50	0.25				0.75/0
Lakeway, TX...	Execu...	0.00		1.25						1.25/0
Lynn Count...	Profe...	1.00			1.75					1.75/0
	Total		0.00	8.25	8.00	8.00	8.25	8.00	0.00	40.50/0

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: Sunday, March 4, 2018

Project	Task		Sun 4	Mon 5	Tue 6	Wed 7	Thu 8	Fri 9	Sat 10	Total
Non-projec...	Administ...			2.75	2.75	3.50	2.00	5.50		16.50/0
Non-projec...	Internal ...			1.50	1.00	0.25	1.50	0.50		4.75/0
Antioch, CA...	Professi...	0.00		0.75		0.50				1.25/0
Burlington, T...	Execu...	1.00			0.50					0.50/0
Coachella, ...	Professi...	0.00		0.50	0.50	0.25	0.75	0.75		2.75/0
Coppell, TX ...	Impleme...	0.00		0.50	0.50	2.25	0.75	0.50		4.50/0
Glen Carbo...	Professi...	0.00		0.50	0.50		1.50	0.25		2.25/0
Hendersonv...	Professi...	0.00				0.50				0.50/0
Hendersonv...	Impleme...	1.00		0.50			0.75			1.25/0
Humboldt ...	Professi...	1.00			0.50	0.25				0.75/0
Lakeway, TX...	Execu...	0.00		1.25						1.25/0
Lynn Count...	Prole...	1.00			1.75					1.75/0
	Total		0.00	8.25	8.00	8.00	8.25	8.00	0.00	40.50/0

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Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: Sunday, March 11, 2018

Project	Task	Sun 11	Mon 12	Tue 13	Wed 14	Thu 15	Fri 16	Sat 17	Total
Non-projec...	Administ...		3.50	3.50	3.50	3.75	3.00		17.25/0.00
Non-projec...	Internal...		2.75	1.50	2.00	0.50	1.00		7.75/0.00
Non-projec...	Paid Tim...						4.00		4.00/0.00
Non-projec...	Sick Time		1.00						1.00/0.00
Coachella, ...	Professi...		0.50	0.25					0.75/0.00
Coppell, TX ...	Impleme...			2.00	1.75	2.00			5.75/0.00
Glen Carbo...	Professi...			1.25					1.25/0.00
Hendersonv...	Impleme...					0.50			0.50/0.00
Lakeview, TX ...	Execu...					0.50			0.50/0.00
Merrill, WI ...	Execu...				0.75				0.75/0.00
Portales, N...	Profe...		0.25			0.75			1.00/0.00
	Total	0.00	8.00	8.50	8.00	8.00	8.00	0.00	40.50/0.00

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: Sunday, March 18, 2018

Project	Task	Sun 18	Mon 19	Tue 20	Wed 21	Thu 22	Fri 23	Sat 24	Total
Non-projec...	Administ...		4.50	2.00	2.25	2.00	1.50		12.25/0.00
Non-projec...	Internal...		1.00	1.50	0.50		1.00		4.00/0.00
Coachella, ...	Professi...								4.00/0.00
Coppell, TX ...	Impleme...		1.00		1.25	1.50	0.25		2.50/0.00
Glen Carbo...	Professi...		0.25		0.25	0.50	1.50		1.00/0.00
Hanford, C...	Professi...						0.25		1.00/0.00
Hendersonv...	Impleme...								1.00/0.00
Lakeway, TX...	Execu...				0.25	0.75			3.25/0.00
Lynn Count...	Profe...		0.25						0.25/0.00
Merrill, WI ...	Execu...				0.50	0.25			0.50/0.00
Muskogee, ...	Executi...				1.50	1.00	0.75		3.25/0.00
Portales, N...	Profe...		1.00	0.50	1.75	2.50	2.75		8.50/0.00
	Total	0.00	8.00	8.00	8.25	8.50	8.00	0.00	40.75/0.00

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Type to search

TIME SHEET

Time Sheet Options

☒ Non-project time  
☐ Open tasks  
☐ Regular tasks

Filter

Submit | Hide status | Show overtime

Week start: Sunday, March 11, 2018

Project	Task	Sun 11	Mon 12	Tue 13	Wed 14	Thu 15	Fri 16	Sat 17	Total
Non-projec...	Administ...		3.50	3.50	3.50	3.75	3.00		17.25/0.00
Non-projec...	Internal ...		2.75	1.50	2.00	0.50	1.00		7.75/0.00
Non-projec...	Paid Tim...						4.00		4.00/0.00
Non-projec...	Sick Time		1.00						1.00/0.00
Coachella, ...	Professi...		0.50	0.25					0.75/0.00
Coppell, TX ...	Impleme...			2.00	1.75	2.00			5.75/0.00
Glen Carbo...	Professi...			1.25					1.25/0.00
Henderso...	Impleme...					0.50			0.50/0.00
Lakeway, TX...	Execu...				0.75	0.50			0.50/0.00
Merrill, WI...	Execu...		0.25						0.75/0.00
Portales, N...	Profe...					0.75			1.00/0.00
	Total	0.00	8.00	6.50	8.00	8.00	8.00	0.00	40.50/0.00

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Time Sheet

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: SUNDAY, MARCH 18, 2018

Project	Task	Sun 18	Mon 19	Tue 20	Wed 21	Thu 22	Fri 23	Sat 24	Total
Non-projec...	Administ...		4.50	2.00	2.25	2.00	1.50		12.25/0.00
Non-projec...	Internal ...		1.00	1.50	0.50		1.00		4.00/0.00
Coachella, ...	Professi...		1.00		1.25	1.50	0.25		4.00/0.00
Coppell, TX ...	Impleme...		0.25		0.25	0.50	1.50		2.50/0.00
Glen Carbo...	Professi...			0.75			0.25		1.00/0.00
Hanford, C...	Professi...			1.00		0.75			1.00/0.00
Henderso...	Impleme...			2.25	0.25				3.25/0.00
Lakeway, TX...	Execu...			0.25					0.25/0.00
Lynn Count...	Profe...					0.25			0.25/0.00
Merrill, WI...	Execu...				0.50				0.50/0.00
Muskogee, ...	Executi...				1.50	1.00	0.75		3.25/0.00
Portales, N...	Profe...		1.00	0.50	1.75	2.50	2.75		8.50/0.00
	Total	0.00	8.00	8.00	8.25	8.50	8.00	0.00	40.75/0.00

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

Week start: Sunday, March 25, 2018

Project	Task		Sun 25	Mon 26	Tue 27	Wed 28	Thu 29	Fri 30	Sat 31	Total
Non-projec...	Administ...			4.25	3.25	2.50	3.00	4.25		17.25/0.00
Non-projec...	Internal ...			1.00	1.50	0.50	0.50	0.50		4.00/0.00
Coachella, ...	Professi...	0.00		0.25	1.00	2.75				4.00/0.00
Glen Carbo...	Professi...	0.00			1.50	1.75	1.50	2.75		7.50/0.00
Hendersonv...	Impleme...	1.00			0.25					0.25/0.00
Lakeway, TX...	Execu...	0.00			0.25					0.25/0.00
Lynn Count...	Profe...	1.00		3.50	0.25					3.75/0.00
Merrill, WI ...	Execu...	0.00				0.25				0.25/0.00
Muskogee, ...	Executi...	1.00		0.25	0.25					0.50/0.00
Portales, N...	Profe...	0.00		0.50		0.50	2.00			3.00/0.00
Washington...	Execu...	0.00					1.00	1.00		2.00/0.00
	Total		0.00	9.75	8.25	8.25	8.00	8.50	0.00	42.75/0.00

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TIME SHEET

Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: SUNDAY, APRIL 01, 2018

Project	Task	Sun 1	Mon 2	Tue 3	Wed 4	Thu 5	Fri 6	Sat 7	Total
Non-projec...	Administ...		2.00	5.25					7.25/0.00
Non-projec...	Internal...		2.00	1.00					3.00/0.00
Non-projec...	Paid Tim...				8.00	8.00	8.00		24.00/0.00
Glen Carbo...	Proless...		0.25	1.00					1.25/0.00
Hendersov...	Impleme...		0.25	0.50					0.50/0.00
Lakeway, TX...	Execu...								0.25/0.00
Lynn Count...	Execu...		2.75						2.75/0.00
Washington...	Execu...		0.75	0.25					1.00/0.00
	Total	0.00	8.00	8.00	8.00	8.00	8.00	0.00	40.00/0.00

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Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

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Week start: Sunday, April 08, 2018

Project	Task	Q	Sun 8	Mon 9	Tue 10	Wed 11	Thu 12	Fri 13	Sat 14	Total
Non-projec...	Administ...			5.25	3.00	1.75	1.00	2.00		13.00/0.00
Non-projec...	Internal ...			0.75	2.00		1.00	1.00		4.75/0.00
Non-projec...	Sick Time						4.00			4.00/0.00
Coachella...	Professi...	0.00		1.00	1.00	2.25				4.25/0.00
Glen Carbo...	Professi...	0.00		0.25	1.75					2.00/0.00
Henderso...	Impleme...	1.00		0.25		0.25	1.25	1.25		3.00/0.00
Lakeview, TX...	Execu...	0.00				3.75				3.75/0.00
Portales, N...	Profe...	0.00		0.25	0.25		1.25	0.75		2.50/0.00
Washington...	Execu...	0.00		0.25				3.75		4.00/0.00
	Total		0.00	8.00	8.00	8.00	8.50	8.75	0.00	41.25/0.00

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Time Sheet Options

Filter

- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Type to search

Submit | Hide status | Show overtime

WEEK START: SUNDAY, April 15, 2018

Project	Task	Sun 15	Mon 16	Tue 17	Wed 18	Thu 19	Fri 20	Sat 21	Total
Non-projec...	Administ...		3.00	3.00	3.50	3.00	4.25		16.75/0.00
Non-projec...	Internal ...		2.50	1.25	0.25		2.50		6.50/0.00
Coachella, ...	Professi...		0.50	0.75	0.50	3.75	0.25		5.75/0.00
Glen Carbo...	Professi...		0.75	1.75	1.00				3.50/0.00
Hendersson...	Impleme...		0.25	0.25	1.25	0.25			2.00/0.00
Humboldt ...	Professi...		0.50				0.50		1.00/0.00
KALAMAZO...	Professi...			0.25					0.25/0.00
Merrill, WI ...	Execu...				0.25		0.50		0.75/0.00
Pearland, T...	Profe...			1.00					1.00/0.00
Portales, N...	Profe...		0.75	0.25	1.50	1.00			3.50/0.00
Washington...	Execu...		0.50		0.25				0.75/0.00
	Total	0.00	8.75	8.50	8.50	8.00	8.00	0.00	41.75/0.00

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- ☒ Non-project time
- ☐ Open tasks
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Submit | Hide status | Show overtime

Week starting: Sunday, April 22, 2018

Project	Task	Sun 22	Mon 23	Tue 24	Wed 25	Thu 26	Fri 27	Sat 28	Total
Non-project...	Administ...								13.25/0
Non-project...	Internal...								6.25/0
Bristol City ...	Imple...		2.00	2.25	1.75	2.75	4.50		0.25/0
Coachella, ...	Professi...				2.25	0.75	1.25		5.50/0
Glen Carbo...	Professi...		2.00	0.25	3.25				7.50/0
Hendersov...	Impleme...			3.25	0.25	1.75	2.25		2.25/0
Humboldt ...	Professi...		0.25	0.75		0.75	0.75		1.25/0
Lakeway, TX...	Execu...			0.75	0.75				0.75/0
Merrill, WI ...	Execu...				0.75	0.50			0.50/0
Oklahoma ...	Imple...		0.25						0.25/0
Pearland, T...	Profe...		1.75	0.25					2.00/0
Portales, N...	Profe...					1.50			1.50/0
	Total	0.00	8.25	8.50	8.75	8.00	8.75	0.00	42.25/0.1

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- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

Submit | Hide status | Show overtime

Week starts Sunday, April 29, 2018

Project	Task	Sun 29	Mon 30	Tue 1	Wed 2	Thu 3	Fri 4	Sat 5	Total
Non-proj...	Administ...								13.50/0
Non-proj...	Internal ...								5.25/0
Coachella...	Professi...			3.25	0.25	0.25	1.50		6.00/0
Glen Carbo...	Professi...			0.25	0.25	2.50	3.00		4.25/0
Hendersom...	Impleme...			0.75	1.00				1.75/0
Humboldt ...	Professi...			0.25		1.25	0.25		1.00/0
KALAMAZO...	Professi...						1.00		1.75/0
Lakeview, TX...	Execu...				1.75				2.00/0
Lynn Count...	Execu...			0.25	1.75				0.25/0
Merrill, WI...	Execu...				0.25				1.00/0
Pearland, T...	Prole...			0.25					0.25/0
Portales, N...	Prole...			1.75		1.00			2.75/0
	Total	0.00	8.00	8.25	8.00	8.00	8.25	0.00	40.50/0

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Submit | Hide status | Show overtime

WEEK START: SUNDAY, MAY 06, 2018

Project	Task		Sun 6	Mon 7	Tue 8	Wed 9	Thu 10	Fri 11	Sat 12	Total
Non-projec...	Administ...									11.00/0
Non-projec...	Internal ...									3.00/0
Non-projec...	Paid Tim...									4.00/0
Burleson, T...	Execu...	97.67		0.50						0.50/0
Coachella, ...	Professi...	100.00		1.00	0.50	2.00	0.50			4.00/0
Glen Carbo...	Professi...	100.00			2.50		1.75			4.25/0
Hendersomv...	Impleme...	98.30		0.25			0.25			0.50/0
Humboldt ...	Professi...	92.45			0.25					0.25/0
KALAMAZO...	Professi...	100.00			0.25		0.75			1.00/0
Lakeview, TX	Execu...	100.00		2.25	0.25	2.50	0.50	3.00		8.50/0
Lynn Count...	Execu...	100.00			0.25		0.50			0.75/0
Merrill, WI ...	Execu...	100.00			0.25					0.25/0
Total			0.00	8.00	8.25	8.00	8.25	8.75	0.00	41.25/0

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TIME SHEET

Week starting Sunday, May 13, 2018

Submit | Hide status | Show overtime

Project	Task	Sun 13	Mon 14	Tue 15	Wed 16	Thu 17	Fri 18	Sat 19	Total
Non-projec...	Administ...		2.75	2.75	1.50	3.00	2.00		12.00/0
Non-projec...	Internal ...		1.25	0.75	2.00	0.75	0.25		5.00/0
Alexander C...	Professi...					0.25			0.25/0
Burleson, T...	Execu...		0.25						0.25/0
Coachella, ...	Professi...		2.25	0.50	0.50	1.00	1.75		6.00/0
Glen Carbo...	Professi...		2.75	1.25			0.50		4.50/0
Henderso...	Impleme...		0.25		0.25	1.25			1.75/0
Humboldt ...	Professi...					0.25	0.50		0.75/0
Lakeview, TX	Execu...		0.25			0.75	1.00		2.00/0
Lynn Count...	Execu...		0.75	2.50					3.25/0
MARCO ISL...	SAAS Cl...				1.00				1.00/0
Merrill, WI ...	Execu...		0.50						0.50/0
	Total	0.00	11.75	9.00	9.00	7.25	9.25	0.00	46.25/0

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Week start: Sunday, May 20, 2018

Project	Task	Sun 20	Mon 21	Tue 22	Wed 23	Thu 24	Fri 25	Sat 26	Total
Non-projec...	Weekda...		8.00				8.00		16.00/0.00
Alexander C...	Professi...		0.25		0.25				0.50/0.00
Turlock, CA ...	Impleme...			8.00	8.00	8.00			24.00/0.00
	Total		8.25	8.00	8.25	8.00	8.00	0.00	40.50/0.00

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☐ Non-project time

☐ Open tasks

☐ Regular tasks

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Week start: Sunday, May 27, 2018

Project	Task	Sun 27	Mon 28	Tue 29	Wed 30	Thu 31	Fri 1	Sat 2	Total
Non-projec...	Administ...								12.75/0.00
Non-projec...	Holiday								8.00/0.00
Non-projec...	Internal ...								2.25/0.00
Non-projec...	Paid Tim...								8.00/0.00
Alexander C...	Professi...		8.00						1.25/0.00
Coachella, ...	Professi...					1.25			1.25/0.00
Hendersonv...	Impleme...					1.75	0.75		2.50/0.00
Humboldt ...	Professi...					0.50	0.25		0.75/0.00
KALAMAZO...	Professi...						2.00		2.00/0.00
Lakeway TX...	Execu...						0.50		0.50/0.00
Portales, N...	Profe...					0.50			0.50/0.00
Turlock, CA...	Impleme...						0.25		0.25/0.00
	Total	0.00	8.00	9.25	8.25	8.00	8.00	0.00	41.50/0.00

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- ☐ Open tasks
- ☐ Regular tasks

Submit Hide status Show overtime

WEEK START: Sunday, June 03, 2018

Project	Task	Sun 3	Mon 4	Tue 5	Wed 6	Thu 7	Fri 8	Sat 9	Total
Non-projec...	Administ...		3.00	3.00	1.50	1.50			9.00/0
Non-projec...	Internal ...		1.00	1.00	0.75	0.75			3.50/0
Non-projec...	Paid Tim...						8.00		8.00/0
Alexander C...	Professi...		1.00	1.00	0.75	1.25			4.00/0
Coachella, ...	Professi...		0.25						0.25/0
Glen Carbo...	ExecuTi...			0.50					0.50/0
Hendersov...	Impleme...					0.50			0.50/0
Humboldt ...	Professi...		0.25						0.25/0
KALAMAZO...	Professi...		0.25			0.50			0.75/0
Lakeway TX...	Execu...		1.25	1.75	0.25	0.25			3.50/0
Lynn Count...	Execu...		0.25	0.75	2.50	1.50			5.00/0
Merrill, WI ...	Execu...				0.50				0.50/0
	Total	0.00	8.25	8.25	8.75	8.25	8.00	0.00	41.50/0

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- ☐ Open tasks
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Type to search

Submit | Hide status | Show overtime

WEEK START: Sunday, June 10, 2018

Project	Task	Sun 10	Mon 11	Tue 12	Wed 13	Thu 14	Fri 15	Sat 16	Total
Non-projec...	Administ...								13.00/0
Non-projec...	Internal ...								3.75/0
Non-projec...	Training ...								1.25/0
Alexander C...	Professi...								1.75/0
Coachella C...	Execu...								4.75/0
Coachella, ...	Professi...								0.25/0
Glen Carbo...	ExecuTi...								1.50/0
Henderson...	Impleme...								0.75/0
KALAMAZO...	Professi...								1.50/0
Lakeway TX...	Execu...								0.75/0
Lynn Count...	Execu...								1.75/0
MARCO ISL...	SAAS Cl...								2.50/0
	Total								40.75/01

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☐ Non-project time  
☐ Open tasks  
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Submit | Hide status | Show overtime

WEEK START: SUNDAY, JUNE 17, 2018

Project	Task	Sun 17	Mon 18	Tue 19	Wed 20	Thu 21	Fri 22	Sat 23	Total
Non-projec...	Administ...		3.25	2.25	1.75	1.50	3.25		12.00/0
Non-projec...	Internal ...		0.75	2.00	2.00	1.00	1.00		6.75/0
Alexander C...	Professi...		0.25	0.25	0.25		0.25		1.00/0
Coachella C...	Execu...		1.25	0.25		1.50	0.25		3.25/0
Glen Carbo...	Execu...		0.25						0.25/0
Hendersonv...	Impleme...		0.25						0.25/0
Humboldt ...	Professi...				0.25	1.25	0.25		1.75/0
KALAMAZO...	Professi...		0.25			0.25	0.75		1.25/0
Lakeway TX...	Execu...		0.25	0.50	1.50		0.75		3.00/0
Lynn Count...	Execu...		1.75	0.50	1.50	1.25	0.25		5.25/0
MARCO ISL...	SAAS Cl...		0.50	0.75	0.25		0.25		1.75/0
Merrill WI ...	Execu...		0.25						0.25/0
Total		0.00	10.00	8.00	8.00	8.50	8.75	0.00	43.25/0

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WEEK START: Sunday, June 24, 2018

Project	Task		Sun 24	Mon 25	Tue 26	Wed 27	Thu 28	Fri 29	Sat 30	Total
Non-projec...	Administ...			3.50	3.25	1.50	2.50	0.75		11.50/0
Non-projec...	Internal ...			1.00	1.75	2.25	1.25			6.25/0
Non-projec...	Paid Tim...							4.00		4.00/0
Alexander C...	Professi...	100.00		0.25	0.25	0.25	1.50	0.25		2.50/0
Coachella C...	Execu...	100.00		0.25	1.25		2.00	1.00		4.50/0
Erie, CO To...	Execu...	90.91			0.75	1.50		2.25		4.50/0
Hendersonv...	Impleme...	98.30			0.25		0.75	0.25		1.25/0
Humboldt ...	Professi...	92.45			0.25	0.50		0.25		1.00/0
KALAMAZO...	Professi...	100.00		0.50	0.25	0.50		0.50		1.75/0
Lakeway, TX...	Execu...	100.00		0.75	0.75	0.25		0.25		2.00/0
Lynn Count...	Execu...	100.00		0.50	0.50	0.25		0.25		1.50/0
Panama Cit...	Impleme...	50.00				0.25		0.25		0.50/0
	Total		0.00	8.00	9.50	8.25	10.00	11.25	0.00	47.00/0

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- ☐ Open tasks
- ☐ Regular tasks

Submit | Hide status | Show overtime

Week starting Sunday, July 01, 2018

Project	Task	Sun 1	Mon 2	Tue 3	Wed 4	Thu 5	Fri 6	Sat 7	Total
Non-projec...	Holiday								8.00/0.00
Non-projec...	Paid Tim...		8.00	8.00	8.00	8.00	8.00		32.00/0.00
	Total	0.00	8.00	8.00	8.00	8.00	8.00	0.00	40.00/0.00

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Submit Hide status Show overtime

WEEK START: Sunday, July 08, 2018

Project	Task		Sun 8	Mon 9	Tue 10	Wed 11	Thu 12	Fri 13	Sat 14	Total
Non-projec...	Administ...				5.25	3.00	1.25	3.25		12.75/0
Non-projec...	Internal ...				1.75	0.25	1.25			3.25/0
Non-projec...	Sick Time			8.00						8.00/0
Alexander C...	Professi...	12/16/2016					2.50	0.50		3.00/0
Coachella C...	Execu...	6/25/2019				1.50				1.50/0
Erie, CO To...	Execu...	2/17/2018			0.25					0.25/0
Hendersonv...	Impleme...	12/15/2016					1.00			1.00/0
Humboldt ...	Professi...	11/30/2016						0.50		0.50/0
Lakeway, TX...	Execu...	9/2/2017				1.25	0.25	0.50		2.00/0
Lynn Count...	Execu...	5/31/2019			0.25	0.75	0.50	0.25		1.75/0
Merrill, WI ...	Execu...	5/30/2019						0.50		0.50/0
Oklahoma ...	Imple...	2/28/2019						0.25		0.25/0
	Total		0.00	8.00	8.00	8.00	8.00	8.25	0.00	40.25/0

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☒ Regular tasks

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WEEK START: Sunday, July 15, 2018

Project	Task		Sun 15	Mon 16	Tue 17	Wed 18	Thu 19	Fri 20	Sat 21	Total
Non-project...	Administ...	100.00		2.25	2.75	1.25	2.50	3.75		12.50/0
Non-project...	Internal...					1.25				1.25/0
Alexander C...	Professi...	0.00		0.25	1.50		0.25	0.25		2.25/0
Burleson, T...	Execu...	97.67		0.25				0.25		0.50/0
Erie, CO To...	Execu...	90.91		0.25	0.50	3.25	0.50	0.25		4.75/0
Hendersonv...	Impleme...	98.30		0.25			0.75	0.25		1.25/0
Humboldt...	Professi...	92.45		0.25	0.25			0.25		0.75/0
LAKE CHAR...	Imple...	96.77					0.25	0.25		0.50/0
Lakeview, TX...	Execu...	100.00		0.25	0.50	0.75	0.25	0.50		2.25/0
Lynn Count...	Execu...	100.00		2.50	0.50		1.50	0.50		5.00/0
Merrill WI...	Execu...	100.00			1.50			0.50		2.00/0
Moorpark...	Execu...	82.61					0.25	0.25		0.50/0
	Total		0.00	8.50	8.50	9.25	8.00	8.50	0.00	42.75/0

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☒ Non-project time

☒ Open tasks

☒ Regular tasks

WEEK START: Sunday, July 22, 2018

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Project	Task	Sun 22	Mon 23	Tue 24	Wed 25	Thu 26	Fri 27	Sat 28	Total
Non-projec...	Administ...								13.00/0
Non-projec...	Internal ...		2.50	3.00	2.50	2.00	3.00		5.75/0
Non-projec...	Training ...		1.75	1.25	1.00	1.75			0.75/0
Alexander C...	Professi...			1.25	0.25				2.25/0
Cedar Park, ...	Impleme...								0.75/0
Erie, CO To...	Execu...		0.25						0.50/0
Hendersonv...	Impleme...					4.00			5.25/0
Humboldt ...	Professi...		0.25	0.25					0.75/0
Lakeway, TX...	Execu...			1.00	0.25				1.50/0
Lynn Count...	Execu...			0.75	1.25	0.25			2.50/0
Merrill, WI ...	Execu...		0.50			0.75			1.50/0
Moorpark, ...	Execu...		0.25		0.75				1.25/0
	Total	0.00	8.00	8.50	8.00	9.00	9.25	0.00	42.75/0

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- ☐ Regular tasks

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Submit | Hide status | Show overtime

WEEK START: Sunday, July 29, 2018

Project	Task	Sun 29	Mon 30	Tue 31	Wed 1	Thu 2	Fri 3	Sat 4	Total
Non-projec...	Administ...		2.25	2.75	2.25	2.25	3.00		12.50/0
Non-projec...	Internal ...		1.25	2.50	1.75				5.50/0
Alexander C...	Professi...		0.25		0.25		0.25		0.75/0
Bristol City ...	Imple...		0.25		0.75	0.25	0.50		1.75/0
Cedar Park, ...	Impleme...		0.25	0.75	1.00	0.25	0.25		2.50/0
Henderso...	Impleme...		1.75			0.25	0.25		2.25/0
LAKE CHAR...	Imple...					0.25	0.25		0.50/0
Lakeway TX...	Execu...		0.50		0.75	0.25	0.25		1.75/0
Lynn Count...	Execu...		0.75		1.25	0.50	0.25		2.75/0
Moorpark, ...	Execu...		0.25	0.25	0.75		1.25		2.50/0
Portales, N...	Profe...		0.25			1.50	0.25		2.00/0
Rochester, L...	Professi...		1.00			2.00	0.25		3.25/0
	Total	0.00	8.75	8.00	9.00	8.00	9.75	0.00	43.50/0.1

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- ☐ Open tasks
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Submit | Hide status | Show overtime

Week start: Sunday, August 05, 2018

Project	Task	Wk	Mon 6	Tue 7	Wed 8	Thu 9	Fri 10	Sat 11	Total
Non-proj...	Administ...		3.50	1.75	2.25	1.75	4.75		14.00/0
Non-proj...	Internal ...		0.50	3.50	2.00	1.50	1.25		8.75/0
Alexander C...	Professi...	12/16/2016	0.25		0.25	0.25	0.25		1.00/0
Bristol City	Imple...	2/28/2019	0.25		0.25				0.50/0
Burleson, T...	Execu...	1/5/2018		0.50	2.50		0.25		3.25/0
Cedar Park, ...	Impleme...	2/28/2019		0.25					0.25/0
Helotes, TX...	Imple...	5/31/2019	0.25						0.25/0
Hendersonv...	Impleme...	12/15/2016				0.25			0.25/0
Humboldt...	Professi...	11/30/2016		0.50					0.50/0
LAKE CHAR...	Imple...	3/31/2019	0.25	0.75	0.75	0.25	0.25		2.25/0
Lakeway, TX...	Execu...	9/2/2017	0.25				0.25		0.50/0
Lynn Count...	Execu...	5/31/2019	0.25						0.25/0
Total			8.25	9.00	8.50	8.00	8.25	0.00	42.00/0

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- ☒ Non-project time
- ☐ Open tasks
- ☐ Regular tasks

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Week start: Sunday, August 12, 2018

Project	Task		Sun 12	Mon 13	Tue 14	Wed 15	Thu 16	Fri 17	Sat 18	Total
Non-projec...	Administ...			3.25	1.50	2.75	4.00	5.25		16.75/0
Non-projec...	Internal ...			0.50	3.75	1.50	1.00			6.75/0
Bristol City ...	Imple...	2/28/2019		1.75						1.75/0
Burleson, T...	Execu...	1/5/2018			0.25		0.50			0.75/0
Cedar Park, ...	Impleme...	2/28/2019				0.25	0.25	0.25		0.50/0
HendersonW...	Impleme...	12/15/2016					0.25			0.25/0
Humboldt ...	Professi...	11/30/2016		0.25						0.25/0
LAKE CHAR...	Imple...	3/31/2019			0.25	2.50	0.50	0.25		3.50/0
Lakeview, TX...	Execu...	9/2/2017		0.25		0.25				0.50/0
Portales, N...	Profe...	8/2/2017					0.75			0.75/0
Rochester, I...	Professi...	4/1/2017		2.00	0.25		0.75	0.50		3.50/0
Sandusky C...	Imple...	3/29/2018			0.25					0.25/0
	Total		0.00	8.50	8.00	8.00	8.00	8.00	0.00	40.50/0

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TIME SHEET

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- ☒ Non-project time
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WEEK START: SUNDAY, AUGUST 19, 2018

Project	Task	Sun 19	Mon 20	Tue 21	Wed 22	Thu 23	Fri 24	Sat 25	Total
Non-projec...	Administ...								13.25/0.00
Non-projec...	Internal ...								5.75/0.00
Burleson, T...	Execu...		2.75	3.75	2.50	1.50	2.75		13.25/0.00
Cedar Park...	Impleme...		2.50	0.75	1.50	1.75	4.00		10.75/0.00
HendersonW...	Impleme...		0.50	0.50	1.75	0.25			3.00/0.00
LAKE CHAR...	Imple...		0.50	0.25	0.50	2.00			3.25/0.00
Portales, N...	Profe...					0.75			0.75/0.00
Rochester, L...	Professi...				1.75	0.25			2.00/0.00
Sandusky C...	Imple...		0.25						0.25/0.00
Turlock CA...	Impleme...		0.25	3.00		1.25	1.25		5.75/0.00
Washington...	Execu...		0.50			0.75			1.25/0.00
	Total	0.00	8.50	8.25	8.00	8.50	8.00	0.00	41.25/0.00

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Time Sheet Options Filter

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- ☐ Open tasks
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WEEK START: Sunday, August 26, 2018

Project	Task		Sun 26	Mon 27	Tue 28	Wed 29	Thu 30	Fri 31	Sat 1	Total
Non-projec...	Administ...	1.00								1.00
Non-projec...	Internal ...	0.00								0.00
Non-projec...	Sick Time	1.00								1.00
Burlason, T...	Execu...	97.67								97.67
Cedar Park, ...	Impleme...	100.00								100.00
Hendersonv...	Impleme...	98.30								98.30
LAKE CHAR...	Imple...	96.77								96.77
Oklahoma ...	Imple...	100.00								100.00
Portales, N...	Profe...	100.00								100.00
Rochester, L...	Profe...	100.00								100.00
Turlock, CA ...	Impleme...	98.72								98.72
Washington...	Execu...	100.00								100.00
	Total									

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☐ Non-project time

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TIME SHEET

WEEK START: Sunday, September 02, 2018

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Project	Task	Sun 2	Mon 3	Tue 4	Wed 5	Thu 6	Fri 7	Sat 8	Total
Non-projec...	Administ...								9.75/0.00
Non-projec...	Holiday								8.00/0.00
Non-projec...	Internal								2.50/0.00
Non-projec...	Paid Tim...								8.00/0.00
Burleson, T...	Execu...			8.00					8.00/0.00
Cedar Park, ...	Impleme...				2.00	4.50	3.25		9.75/0.00
Hendersonv...	Impleme...								0.75/0.00
Oklahoma ...	Imple...				0.25	0.50	2.75		3.50/0.00
Rochester, J...	Professi...					0.25			0.25/0.00
Sandusky C...	Imple...				4.00	0.50			4.50/0.00
Turlock, CA ...	Impleme...				1.25	0.50	0.50		2.25/0.00
Washington...	Execu...								0.50/0.00
	Total				9.50	8.00	8.00	0.00	41.50/0.00

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TIME SHEET

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☒ Non-project time  
☐ Open tasks  
☐ Regular tasks

Filter

Type to search

Submit | Hide status | Show overtime

Week start: Sunday, September 03, 2018

Project	Task	Sun 9	Mon 10	Tue 11	Wed 12	Thu 13	Fri 14	Sat 15	Total
Non-projec...	Administ...		4.75						4.75/0.00
Non-projec...	Weekda...								16.00/0.00
Burlison, T...	Execu...			8.00			8.00		0.75/0.00
Cedar Park...	Impleme...		0.50						0.50/0.00
LAKE CHAR...	Imple...		0.25						0.25/0.00
Oklahoma ...	Imple...		1.00						1.00/0.00
Sandusky C...	Imple...		0.25						0.25/0.00
Turlock, CA ...	Impleme...		0.50	8.00	8.00	8.00	8.00		16.50/0.00
	Total	0.00	8.00	8.00	8.00	8.00	8.00	0.00	40.00/0.00

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Week start Sunday, September 16, 2018

Project	Task		Sun 16	Mon 17	Tue 18	Wed 19	Thu 20	Fri 21	Sat 22	Total
Non-projec...	Administ...			6.00	1.75	4.75	3.50	4.00		20.00/0.00
Non-projec...	Internal ...			1.25				1.00		2.25/0.00
Burleson, T...	Execu...	1/5/2018			2.00					2.00/0.00
Cedar Park, ...	Impleme...	2/28/2019		2.00				0.50		2.50/0.00
Dearborn, ...	Professi...	11/2/2017				0.25	2.50	1.50		4.25/0.00
Hendersonv...	Impleme...	12/15/2016			0.50		0.50	1.50		2.50/0.00
LAKE CHAR...	Imple...	3/31/2019					1.25			1.25/0.00
Oklahoma ...	Imple...	2/28/2019					0.25			0.25/0.00
Rochester, I...	Professi...	4/1/2017			0.25	2.50				2.75/0.00
Sandusky C...	Imple...	3/29/2018				3.50				3.50/0.00
Turlock, CA ...	Impleme...	4/1/2018		0.25	1.75			0.25		2.25/0.00
	Total		0.00	7.50	8.25	11.00	8.00	8.75	0.00	43.50/0.00

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WEEK START: Sunday, September 30, 2018

Project	Task	Sun 30	Mon 1	Tue 2	Wed 3	Thu 4	Fri 5	Sat 6	Total
Non-projec...	Administ...		1.00						1.00/0.00
Non-projec...	Weekda...						8.00		8.00/0.00
Non-projec...	Weeken...	8.00							8.00/0.00
Dearborn, ...	Professi...		8.00	8.25	8.25	8.00			32.50/0.00
Helotes, TX...	Imple...		0.50						0.50/0.00
Oklahoma ...	Imple...		0.25						0.25/0.00
	Total	8.00	9.75	8.25	8.25	8.00	8.00	0.00	50.25/0.00

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Submit | Hide status | Show overtime

WEEK START: SUNDAY, OCTOBER 07, 2018

Project	Task		Sun 7	Mon 8	Tue 9	Wed 10	Thu 11	Fri 12	Sat 13	Total
Non-projec...	Administ...			4.75	4.00	2.25	3.50	3.25		17.75/0.00
Non-projec...	Internal...			1.75	1.50	1.25		2.50		7.00/0.00
Burleson, T...	Execu...	1/5/2018								2.50/0.00
Cedar Park...	Impleme...	2/28/2019					2.50			1.00/0.00
Dearborn...	Professi...	11/2/2017		1.75	1.00	0.75	1.00			4.50/0.00
Helotes, TX...	Imple...	5/31/2019				1.00				1.00/0.00
Henderso...	Impleme...	12/15/2016					0.75			0.75/0.00
LAKE CHAR...	Imple...	3/31/2019			0.25	1.75		0.75		2.75/0.00
Oklahoma...	Imple...	2/28/2019				1.00		0.25		1.25/0.00
Sandusky, C...	Imple...	3/29/2018					0.25			0.25/0.00
Turlock, CA...	Impleme...	4/1/2018			1.25			0.50		1.75/0.00
	Total			8.25	8.00	8.00	8.00	8.25	0.00	40.50/0.00

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☐ Regular tasks

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WEEK START: Sunday, October 14, 2018

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Project	Task	Sun 14	Mon 15	Tue 16	Wed 17	Thu 18	Fri 19	Sat 20	Total
Non-projec...	Administ...		4.00	3.25	4.00	2.25			13.50/0
Non-projec...	Internal...		2.00	0.50	0.25	1.50			4.25/0
Non-projec...	Sick Time				2.00	3.00	3.00		6.00/0
Bristol City ...	Imple...	2/28/2019							2.00/0
Burleson, T...	Execu...	1/5/2018		0.75					0.75/0
Cedar Park, ...	Impleme...	8/31/2019		0.75	0.25	0.25			1.25/0
Dearborn, ...	Execu...	10/16/2019					1.50		1.50/0
Dearborn, ...	Professi...	11/2/2017	0.25		1.50				1.75/0
Helotes, TX...	Imple...	5/31/2019	1.50			1.00	1.25		3.75/0
Hendersonv...	Impleme...	12/15/2016				0.50			0.50/0
LAKE CHAR...	Imple...	3/31/2019	0.75	1.00		0.25	1.00		3.00/0
Rochester, L...	Imple...	8/31/2019		1.50					1.50/0
	Total		8.50	8.00	8.00	8.75	8.75	0.00	42.00/0

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Submit | Hide status | Show overtime

Week start: Sunday, October 21, 2018

Project	Task	Sun 21	Mon 22	Tue 23	Wed 24	Thu 25	Fri 26	Sat 27	Total
Non-projec...	Administ...		4.25	2.50	4.00	2.25	3.50		16.50/0.00
Non-projec...	Internal ...		3.00	3.25	1.00				7.25/0.00
Non-projec...	Paid Tim...						4.00		4.00/0.00
Dearborn...	Execu...	1.00	96.49						3.75/0.00
Helotes TX...	Imple...	0.00	100.00						5.25/0.00
Hendersov...	Impleme...	1.00	98.30			1.00			1.00/0.00
LAKE CHAR...	Imple...	1.00	96.77			1.00			2.75/0.00
Sandusky C...	Imple...	1.00	97.55			1.25			1.50/0.00
Turlock, CA ...	Impleme...	1.00	98.72						0.75/0.00
	Total	0.00	8.25	10.00	8.25	8.25	8.00	0.00	42.75/0.00

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